



## TITLE V OPERATING PERMIT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and § 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

<b>Title V Permit Number</b>	178 - 0086 - TV
<b>Client/ Sequence /Town/Premises Numbers</b>	130 / 02 / 178 / 0005
<b>Date Issued</b>	Original Date Issued: December 15, 2003 Modified Date Issued: June 9, 2006
<b>Expiration Date</b>	December 15, 2008

**Corporation:**

*Sikorsky Aircraft Corporation*

**Premises Location:**

*6900 Main Street, Stratford, Connecticut 06615-9129*

**Name of Responsible Official and Title:**

*Thomas C. Hutton, Vice President*

All the following attached pages, 2 through 67, are hereby incorporated by reference into this Title V Operating Permit.

GINA MCCARTHY  
Gina McCarthy  
Commissioner

6/9/06  
Date

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## LIST OF ACRONYMS

<i>Acronym</i>	<i>Description</i>
acfm	Actual cubic feet per minute
ASC	Actual Stack Concentration
BACT	Best Available Control Technology
BAM	Bureau of Air Management
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CP/OP	Construction Permit/Operating Permit
CTG	Control Technology Guideline
DEP	Department of Environmental Protection
dscf	Dry standard cubic feet
dscm	Dry standard cubic meters
EU	Emission Unit
ERC	Emission Reduction Credit
EPA	Environmental Protection Agency
FLER	Full load emission rate
GEU	Grouped Emission Unit
gph	Gallons per hour
gpm	Gallons per minute
HAP	Hazardous Air Pollutant
HLV	Hazard Limiting Value
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MASC	Maximum Allowable Stack Concentration
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
PM	Particulate Matter
ppmv	Parts per million, volumetric basis
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
RMP	Risk Management Plan
SIC	Standard Industrial Classification Code
SIP	State Implementation Plan
TOC	Total Organic Carbon
tph	Tons per hour
tpy	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

## **Title V Operating Permit**

**All conditions in §§ III, IV, VI and VII of this permit are enforceable by both the Administrator and the Commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in § III of this permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in §§ III, IV, VI and VII of this permit in accordance with the Clean Air Act (CAA), as amended.**

## **Section I: Premises Information/Description**

### **A. PREMISES INFORMATION**

Name of Business: Sikorsky Aircraft Corporation

Primary SIC: 3721

Other SIC:

Facility Mailing Address: 6900 Main Street, PO Box 9729, Stratford, CT 06615-9129

Telephone Number: (203) 386-4000

### **B. PREMISES DESCRIPTION**

Sikorsky Aircraft's main plant, located at 6900 Main Street, Stratford, CT, is used for the manufacture and overhaul/repair of military and commercial helicopters. The facility consists of 20 major buildings totaling approximately 2.4 million square feet, on a 248.6-acre parcel of land.

Sikorsky Aircraft was required to apply for and obtain a Title V permit because:

1. They have one or more emissions units which is subject to 40 CFR 60;
2. They have one or more emissions units which is subject to 40 CFR 61;
3. They have one or more emissions units which is subject to 40 CFR 63;
4. They had one or more emissions units which was subject to 40 CFR 68;
5. They have one or more emissions units which has the potential to emit, including fugitive emissions to the extent quantifiable, 10 TPY or more of any hazardous air pollutant;
6. They have one or more emissions units which has the potential to emit, including fugitive emissions to the extent quantifiable, 25 TPY or more of any combination of hazardous air pollutants;
7. They have one or more emissions units which has the potential to emit, including fugitive emissions to the extent quantifiable, 100 TPY or more of any regulated air pollutant;
8. They have one or more emissions units which has the potential to emit, including fugitive emissions to the extent quantifiable, 25 TPY or more of Volatile Organic Compounds in a severe ozone non-attainment area.

The main manufacturing process activities conducted at the facility include machining, forming of sheet metal and composite parts, heat treating, metal finishing and etching, rotor blade manufacturing, wiring harness fabrication, assembly of gear boxes and transmissions/rotor heads, painting and depainting, and final assembly of aircraft. Other facility operations include aircraft/rotor blade/transmission testing, fueling, engineering, laboratory research, shipping/receiving, purchasing, administration, maintenance, wastewater treatment, and the generation of steam, compressed air and chilled water.

The principal materials used in the manufacturing processes and facility operations include:

- Aluminum, titanium, magnesium, carbon steel, and stainless steel
- Various acids, caustics, plating solutions, and rinsewaters
- Various coolants, and quench, cutting, and lubricating oils
- Natural gas, fuel oil, jet fuel, gasoline, methanol, and liquid nitrogen and argon
- Primers, topcoats, solvents, and paint strippers
- Fiberglass, Kevlar, graphite and boron cloth, and related resins
- Various sealants and adhesives

## **Section I: Premises Information/Description**

From the perspective of air emission regulation and control, the most important activities are steam generation, emergency power generation, solvent cleaning, painting/depainting, and chromium anodizing. Details of these activities are provided in the following paragraphs.

Steam generation is provided by the powerhouse, which contains five steam boilers, each rated at approximately 50 MMBtu/hr. These boilers are operated on either natural gas or No. 6 fuel oil. Typically, three boilers are operated during the heating season, with only two needed during the rest of the year.

Emergency engines power various generators and fire pumps. The majority of the emergency generators have capacities that do not trigger the permitting requirements of RCSA 22a-174-3a. The Caterpillar 3412 Emergency Engine and the four Fire Pumps do meet the permitting requirements of RCSA 22a-174-3a, but are exempt from permitting under RCSA 22a-174-3b(e).

Solvent cleaning of parts is generally performed manually, using pre-moistened “wipes”. The cleaning is done prior to adhesive bonding, sealing and priming. Some removal of oils and greases is performed by soaking the parts in cold cleaning tanks. There are no vapor degreasers at the facility. In accordance with the requirements contained in the Aerospace NESHAP (40 CFR 63, Subpart GG), the majority of the cleaning operations are performed using low vapor pressure solvents.

Painting is generally done using water-reducible primers and high solids (low VOC) topcoats. A relatively small amount of “specialty coatings” are also used. The necessary use of some “non-compliant” coatings is offset by internal VOC credits related to the reformulation of a Nital Etch solution and certain coatings, as allowed by Consent Order 8246. The depainting of entire aircraft is performed in the plastic media blast facility. Some parts are depainted using conventional methylene chloride-based paint strippers.

Chromium anodizing is principally performed in a single tank at the facility. The tank ventilation system exhausts through a multi-stage, wet-pad scrubber, which has been shown by stack testing to meet the requirements of the applicable Chromium NESHAP (40 CFR 63, Subpart N) as well as RCSA § 22a-174-29.

The individual emission sources at the Stratford facility associated with the activities described above are listed in Table II.A-1. The majority of the sources have been grouped into functional emissions units (GEUs) to facilitate the presentation of the required information. The table provides a description of each source; any associated emissions control equipment; and any associated permit, order, or registration numbers.

## Section II: Emissions Units Information

### A. EMISSIONS UNITS IDENTIFICATION: STANDARD OPERATING SCENARIO (SOS)

Emission units are set forth in Table II.A.1.

<b>TABLE II.A.1: EMISSIONS UNIT DESCRIPTION</b>			
<b>Emissions Units</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit, Order, or Registration Number*</b>
GEU 001	Wickes Boiler #1 Wickes Boiler #2 Wickes Boiler #3 Wickes Boiler #4	None	R-0019, CO-7003A, CO-8120A R-0018, CO-7003A, CO-8120A R-0017, CO-7003A, CO-8120A R-0016, CO-7003A, CO-8120A
EU 002	Nebraska Boiler #5	None	P-0039, CO-8120A
GEU 003	Caterpillar 3412 Emergency Engine Fire Pumps (4)	None	None
GEU 004	Hand Wiping Operations	None	None
EU 005	Depainting – Plastic Media Blast	Baghouse	None
GEU 006	Cold Cleaning Tanks	Covers	None
GEU 007	Special Prime Prime Booths 2A, 2B, 2C Dip Coat Prime Booth Dyescan Booth Blade Prime (Bond) Paint Spray Booth – A/EDC Paint Shop #1 Blades Small Parts Paint Booth Finishes Bldg. Cell #3 Finishes Bldg. Cell #1 Finishes Bldg. Cell #2 Finishes Bldg. VH Parts #4 Conformal Coatings Paint Booth	Pumpless waterwash Pumpless waterwash Dry panel filters 3-stage dry filter Pumpless waterwash 2-stage dry filter 3-Stage dry filter Downflow waterwall Horizontal waterfloor Horizontal waterfloor Horizontal waterfloor 3-Stage dry filter 3-Stage dry filter	CO-8246 R-0024, CO-8246 R-0024, CO-8246 CO-8246 CO-8246 CO-8246 OP-0078, CO-8246 OP-0038, CO-8246 OP-0037, CO-8246 OP-0036, CO-8246 OP-0035, CO-8246 GPSC-0077, CO-8246 GPSC-0081, CO-8246
EU 008	Solution Tank G84 - Anodize	Mesh Pad Scrubber	CO-1057
EU 009	Solution Tank GN276 – Nital Etch	Cover/ wet scrubber	CO-8246

(\*) It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V Operating Permit.



## Section II: Emissions Units Information

The permittee shall be allowed to operate under the following standard operating scenario (SOS) without notifying the Commissioner. No alternative operating scenario (AOS) has been approved as a part of this permit.

TABLE II.A.2: OPERATING SCENARIO IDENTIFICATION		
Identification of Operating Scenario	Emissions Units Associated with the Scenario	Description of Scenario
SOS-1	All emissions units	<p>All emissions units listed in Table II.A.1 are included in this SOS and shall be operated in accordance with applicable permit terms and conditions, and if not subject to permit terms and conditions, shall be operated in accordance with design specifications.</p> <p>Sikorsky Aircraft's main plant in Stratford, CT, is used for the manufacture and overhaul/repair of military and commercial helicopters. The main manufacturing process activities conducted at the facility include machining, forming of sheet metal and composite parts, heat treating, metal finishing and etching, rotor blade manufacturing, wiring harness fabrication, assembly of gear boxes and transmissions/rotor heads, painting and depainting, and final assembly of aircraft. Other facility operations include aircraft/rotor blade/transmission testing, fueling, engineering, laboratory research, shipping/receiving, purchasing, administration, maintenance, wastewater treatment, and the generation of steam, compressed air and chilled water.</p> <p>Fuel combustion equipment includes powerhouse boilers used to generate steam using either fuel oil or natural gas (GEU 001, EU 002); and diesel-fueled emergency engines (GEU 003).</p> <p>Miscellaneous operations identified as emission units because of the existence of an applicable requirement include miscellaneous hand wiping with solvents throughout the facility (GEU 004), the plastic media blast (EU 005), and various cold cleaners (GEU 006).</p> <p>Coating operations are situated throughout the facility and include paint spray booths, a dip tank and associated electrically heated drying ovens (GEU 007).</p> <p>Chromium anodizing is performed in a process solution tank (EU 008). Another process solution tank with an applicable requirement is a Nital Etch tank (EU 009).</p>

### Section III: Applicable Requirements and Compliance Demonstration

The following tables contain summaries of applicable regulations and compliance demonstration for each identified Emissions Unit and Operating Scenario, regulated by this permit.

#### A. EMISSION UNITS GEU 001 (Wickes Boilers 1 through 4)

Table III.A: EMISSION UNITS GEU 001 (Wickes Boilers 1 through 4)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	TSP	The TSP emissions shall not exceed 0.14 lb/MMBtu when operating on number 6 fuel.  The TSP emissions shall not exceed 0.20 lb/MMBTU when operating on natural gas.	RCSA 22a-174-18(e)(2)(A)	A.1
SOS-1	SOx	The sulfur content in the number 6 fuel used by the permittee shall not exceed 1% from the months of March through November, inclusive.  The sulfur content in the number 6 fuel used by the permittee shall not exceed 0.5% from the months of December through February, inclusive.	State Order No. 7003A	A.2
SOS-1	Boiler Capacity	The permittee shall operate no more than two (2) boilers at any one time from the months of March through November, inclusive.  The two boilers shall each be operated at no greater than seventy-five percent (75%) of maximum design capacity	State Order No. 7003A	A.3
SOS-1	NOx	The NOx emissions shall not exceed 0.25 lb/MMBtu when operating on number 6 fuel.  The NOx emissions shall not exceed 0.20 lb/MMBtu when operating on natural gas.	RCSA 22a-174-22(e); Connecticut Trading Agreement and Order No. 8120A  RCSA 22a-174-22(e)	A.4

#### A.1 TSP (GEU 001)

##### A.1.1 Monitoring and Testing Requirements

- a. The permittee shall verify emissions using the latest version of AP-42 emissions factors. [RCSA § 22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure TSP emissions using an EPA Method 5 stack test. [RCSA § 22a-174-5(e)(2)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### **A.1.2 Record Keeping Requirements**

The permittee shall make calculations and documentation of TSP emissions on a monthly basis using latest version of AP-42 emissions factors. [RCSA § 22a-174-4(c)(2)]

#### **A.1.3 Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII of this permit]

### **A.2 SO<sub>x</sub> (GEU 001)**

#### **A.2.1. Monitoring and Testing Requirements**

The Commissioner may require the permittee to analyze for the sulfur content of liquid fuels, which shall be done according to the most current American Society for Testing and Materials, methods D 129 or D 1552 [RCSA § 22a-174-5(b)(1)].

#### **A.2.2. Record Keeping Requirements**

The permittee shall make and keep the following records for a minimum of five (5) years commencing on the date such records were created. The permittee shall maintain, with respect to each shipment of liquid fuel to be used in the emission units authorized hereunder, a shipping receipt and certification from the fuel supplier certifying the name of the fuel supplier, type of fuel delivered, API gravity of such fuel, the percentage of sulfur in such fuel, by weight, dry basis, and the method used by the fuel supplier to determine the sulfur content of such fuel [RCSA § 22a-174-19(a)(5)]; or, a copy of a current contract with the fuel supplier supplying the fuel that includes the name of the fuel supplier, the type or grade of fuel delivered, and the sulfur content of the fuel [RCSA § 22a-174-33(j)(1)(K)(ii)].

#### **A.2.3. Reporting Requirements**

The Commissioner may require the permittee to submit a fuel analysis, results of stack sampling, or both, prepared at the expense of the merchant or user, to ensure compliance with the limitation in Table III.A. Such information shall be submitted to the Commissioner within thirty days of request. [RCSA § 22a-174-19(a)(5)]

### **A.3 Boiler Capacity (GEU 001)**

#### **A.3.1. Monitoring and Testing Requirements**

The permittee shall monitor fuel consumption and operating capacity of each boiler on a monthly basis. [State Order 7003A(6)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### **A.3.2 Record Keeping Requirements**

The permittee shall maintain records of fuel consumption as to determine compliance of State Order No. 7003A on a monthly basis and period from March through November, inclusive. [State Order 7003A(6)] Such records shall contain the following information:

- a. Date boiler(s) were used;
- b. Boiler number used;
- c. Boiler capacity (steam load) operated at;
- d. Sulfur content of fuel oil used

#### **A.3.3. Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII.E of this permit]

### **A.4 NO<sub>x</sub> (GEU 001)**

#### **A.4.1. Monitoring and Testing Requirements**

- a. The permittee shall comply with RCSA 22a-174-22 in accordance with the compliance plan submitted to and approved by the Department. [RCSA 22a-174-22(m)]
- b. The permittee shall conduct an emission test at least once every five years. [RCSA §22a-174-22(k)(1)] Testing shall be conducted in compliance with sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA §22a-174-5(d).

#### **A.4.2. Record Keeping Requirements**

- a. The permittee shall keep monthly and annual records of all fuel used and operating hours. [RCSA 22a-174-22(l)(1)(C)]
- b. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance done on the unit. [RCSA 22a-174-22(l)(1)(D)]
- c. The permittee shall keep copies of all documents submitted to the Commissioner pursuant to RCSA 22a-174-22. [RCSA 22a-174-22(l)(1)(E)]
- d. The permittee shall keep procedures for calculating NO<sub>x</sub> emission rates. [RCSA 22a-174-22(l)(1)(G)]
- e. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA 22a-174-22(l)(1)(H)]

### Section III: Applicable Requirements and Compliance Demonstration

- f. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA 22a-174-4(c).
- g. The permittee shall maintain all recorded data required by this permit at the site for a minimum of five years, commencing from the date such records were created and made available upon request by the Department. [RCSA 22a-174-33(o)(2)]

#### A.4.3 Reporting Requirements

The permittee shall provide the records to the Commissioner within thirty days of receipt of a written request from the Commissioner or such sooner time as the Commissioner may require. [RCSA 22a-174-4(c)(1)]

#### A.4.4 Discrete Emission Reduction Credits

**[§ A.4.4 is only applicable when the boilers are fired on number 6 fuel oil.]**

- a. The permittee shall have in its possession approved DERCs for GEU 001. The permittee shall document and record the amounts of all fuel and approved DERCs used by GEU 001 each month. The permittee shall maintain and provide such records in accordance with RCSA § 22a-174-4 until April 30, 2007 and;

- i. Before the first day of each month, Sikorsky shall calculate projected DERCs required for GEU 001 for the next calendar month as follows:

$$\text{DERCs (tons)} = (\text{Estimated Fuel Use in MMBtu} \times (\text{FLER(lb/MMBtu)} - [0.95 \times 0.25 \text{ lb/MMBtu}])) / 2000 \text{ pounds}$$

Where:

FLER means full load emission rate referenced in Table 1 of Trading Agreement and Order 8120A [paragraph B.2.a of Trading Agreement and Order 8120A]

- ii. The permittee shall have in its possession sufficient approved DERCs no later than the first of each calendar month to assure compliance for, at a minimum, that month. Excess DERCs from previous months can be applied to subsequent months. Approved DERCs shall be acquired for GEU 001 until the permittee achieves compliance with the emission standard in Table III.A of this permit. [paragraph B.2 of Trading Agreement and Order No. 8120A]
    - iii. The permittee shall, no later than the twentieth day of each month, calculate approved DERCs used in the preceding calendar month. [paragraph B.2.b of Trading Agreement and Order No. 8120A]

### **Section III: Applicable Requirements and Compliance Demonstration**

- iv. The permittee shall make and keep records of:
  - 1. Daily fuel use and fuel type;
  - 2. excess NOx emissions;
  - 3. the number of DERCs in its possession, created, purchased and used each month in accordance with the appropriate emission rates and limits in Trading Agreement and Order 8120A;
  - 4. the number of DERCs used during the ozone season and non-ozone season as well as documentation attesting to the fact that approved DERCs used during the ozone season were generated during the ozone season. (Generator certification of this fact shall be sufficient.)
  - 5. Sikorsky shall maintain and submit such records to the Commissioner in accordance with § 22a-174-22 of RCSA. [paragraph B.3 of Trading Agreement and Order No. 8120A]
- v. The permittee shall retain records and supporting documentation as described in Trading Agreement and Order 8120A for a minimum of five years, commencing on the date such records were created. The permittee shall provide the records specified above to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. All records shall be maintained in accordance with §§ 22a-174-4 and 22a-174-22 of RCSA [paragraph B.4 of Trading Agreement and Order 8120A]
- vi. At a minimum, DERCs required shall be adjusted upwards by at least 100% if DERCs are not in the permittee's possession prior to use. However, based on the gravity of the non-compliance, the Commissioner may require additional upward adjustment. [paragraph B.7 of Trading Agreement and Order No. 8120A]
- vii. Exceedance of an established FLER shall subject the permittee to make restitution by matching the quantity of emissions ("true up") caused by the exceedance plus a 100% premium penalty. The true up in tons of DERCs shall be equal to the FLER exceedance in lbs/MMBtu, multiplied by the total heat input during the period of non-compliance divided by 2000 lbs/ton. If the period of non-compliance is not known, the time period from the completion of the last/previous Department witnessed stack test through the date compliance is achieved as approved by the Commissioner shall be used. However, based on the gravity of the noncompliance, the Commissioner may require additional upward adjustment. [paragraph B.9 of Trading Agreement and Order No. 8120A]

## Section III: Applicable Requirements and Compliance Demonstration

### B. EMISSION UNIT EU 002 (Nebraska Boiler #5)

Table III.B: EMISSION UNIT EU 002 (Nebraska Boiler #5)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	TSP	The TSP emissions shall not exceed 0.14 lb/MMBtu when operating on number 6 fuel.  The TSP emissions shall not exceed 0.10 lb/MMBtu when operating on natural gas.	RCSA § 22a-174-18(e)(2)(A)	B.1
SOS-1	SOx	The sulfur content in the number 6 fuel shall not exceed 1% by weight (dry basis).	RCSA § 22a-174-19(a)(2)(i)	B.2
SOS-1	#6 Fuel Oil	The number 6 fuel use shall not exceed 500,000 gallons per year.	Construction and Operating Permit 178-0039	B.3
SOS-1	NOx	The NOx emissions shall not exceed 0.25 lb/MMBtu when operating on number 6 fuel.  The NOx emissions shall not exceed 0.20 lb/MMBtu when operating on natural gas.	RCSA 22a-174-22(e); Connecticut Trading Agreement and Order No. 8120A  RCSA 22a-174-22(e)	B.4

#### B.1 TSP (EU 002)

##### B.1.1 Monitoring and Testing Requirements

- a. The permittee shall verify emissions using the latest version of AP-42 emissions factors. [RCSA § 22a-174-33(j)(1)(K)(ii)]
- b. If required by the Commissioner, the permittee shall measure TSP emissions using an EPA Method 5 stack test. [RCSA § 22a-174-5(e)(2)]

##### B.1.2 Record Keeping Requirements

The permittee shall make calculations and documentation of TSP emissions on a monthly basis using latest version of AP-42 emissions factors. [RCSA § 22a-174-4(c)(2)]

##### B.1.3 Reporting Requirements

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII of this permit]

## **Section III: Applicable Requirements and Compliance Demonstration**

### **B.2 SO<sub>x</sub> (EU 002)**

#### **B.2.1 Monitoring and Testing Requirements**

The Commissioner may require the permittee to analyze for the sulfur content of liquid fuels, which shall be done according to the most current American Society for Testing and Materials, methods D 129 or D 1552 [RCSA § 22a-174-5(b)(1)].

#### **B.2.2 Record Keeping Requirements**

The permittee shall make and keep the following records for a minimum of five (5) years commencing on the date such records were created. The permittee shall maintain, with respect to each shipment of liquid fuel to be used in the emissions unit authorized hereunder, a shipping receipt and certification from the fuel supplier certifying the name of the fuel supplier, type of fuel delivered, API gravity of such fuel, the percentage of sulfur in such fuel, by weight, dry basis, and the method used by the fuel supplier to determine the sulfur content of such fuel [RCSA § 22a-174-19(a)(5)]; or, a copy of a current contract with the fuel supplier supplying the fuel that includes the name of the fuel supplier, the type or grade of fuel delivered, and the sulfur content of the fuel [RCSA § 22a-174-33(j)(1)(K)(ii)].

#### **B.2.3 Reporting Requirements**

The Commissioner may require the permittee to submit a fuel analysis, results of stack sampling, or both, to ensure compliance with the limitation in Table III.B. Such information shall be submitted to the Commissioner within thirty days of request. [RCSA § 22a-174-19(a)(5)]

### **B.3 #6 Fuel Oil (EU 002)**

#### **B.3.1 Monitoring and Testing Requirements**

Annual fuel consumption shall be based on a consecutive twelve (12) month time period and shall be determined by adding (for each fuel) the current month's fuel usage to that of the previous eleven (11) months. The permittee shall make these calculations monthly. [RCSA § 22a-174-5(b)(1)].

#### **B.3.2 Record Keeping Requirements**

The permittee shall record monthly and annual fuel usage. The annual fuel usage shall be based on any consecutive twelve (12) month time period and shall be calculated by adding the current month's fuel usage to that of the previous eleven (11) months. The permittee shall make and keep records as described, for a minimum of (5) years commencing on the date such records were created. [§ VII.F of this permit]

#### **B.3.3. Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII.E of this permit]



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#### **B.4 NO<sub>x</sub> (EU 002)**

##### **B.4.1. Monitoring and Testing Requirements**

- a. The permittee shall comply with RCSA 22a-174-22 in accordance with the compliance plan submitted to and approved by the Department. [RCSA 22a-174-22(m)]
- b. The permittee shall conduct an emission test at least once every five years. [RCSA §22a-174-22(k)(1)] Testing shall be conducted in compliance with sampling and analytical procedures approved under 40 CFR Part 60, Appendix A, or under procedures in RCSA §22a-174-5(d).

##### **B.4.2. Record Keeping Requirements**

- a. The permittee shall keep monthly and annual records of all fuel used and operating hours. [RCSA 22a-174-22(l)(1)(C)]
- b. The permittee shall keep records of all tune-ups, repairs, replacement of parts and other maintenance done on the unit. [RCSA 22a-174-22(l)(1)(D)]
- c. The permittee shall keep copies of all documents submitted to the Commissioner pursuant to RCSA 22a-174-22. [RCSA 22a-174-22(l)(1)(E)]
- d. The permittee shall keep procedures for calculating NO<sub>x</sub> emission rates. [RCSA 22a-174-22(l)(1)(G)]
- e. The permittee shall keep records of the dates, times, and places of all emission testing done on this unit, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing. [RCSA 22a-174-22(l)(1)(H)]
- f. The permittee shall maintain reports of all monitoring and test data in accordance with RCSA 22a-174-4(c).
- g. The permittee shall maintain all recorded data required by this permit at the site for a minimum of five years, commencing from the date such records were created and made available upon request by the Department. [RCSA 22a-174-33(o)(2)]

##### **B.4.3 Reporting Requirements**

The permittee shall provide the records to the Commissioner within thirty days of receipt of a written request from the Commissioner or such sooner time as the Commissioner may require. [RCSA 22a-174-4(c)(1)]

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#### B.4.4 Discrete Emission Reduction Credits

**[§ B.4.4 is only applicable when the boiler is fired on number 6 fuel oil.]**

- a. The permittee shall have in its possession approved DERCs for EU 002. The permittee shall document and record the amounts of all fuel and approved DERCs used by EU 002 each month. The permittee shall maintain and provide such records in accordance with RCSA § 22a-174-4 until April 30, 2007 and;

- i. Before the first day of each month, Sikorsky shall calculate projected DERCs required for EU 002 for the next calendar month as follows:

$$\text{DERCs (tons)} = (\text{Estimated Fuel Use in MMBtu} \times (\text{FLER}(\text{lb/MMBtu}) - [0.95 \times 0.25 \text{ lb/MMBtu}])) / 2000 \text{ pounds}$$

Where:

FLER means full load emission rate referenced in Table 1 of Trading Agreement and Order 8120A [paragraph B.2.a of Trading Agreement and Order No. 8120A]

- ii. The permittee shall have in its possession sufficient approved DERCs no later than the first of each calendar month to assure compliance for, at a minimum, that month. Excess DERCs from previous months can be applied to subsequent months. Approved DERCs shall be acquired for EU 002 until the permittee achieves compliance with the emission standard in Table III.B of this permit. [paragraph B.2 of Trading Agreement and Order No. 8120A]
- iii. The permittee shall, no later than the twentieth day of each month, calculate approved DERCs used in the preceding calendar month. [paragraph B.2.b of Trading Agreement and Order No. 8120A]
- iv. The permittee shall make and keep records of:
1. Daily fuel use and fuel type;
  2. excess NOx emissions;
  3. the number of DERCs in its possession, created, purchased and used each month in accordance with the appropriate emission rates and limits in Trading Agreement and Order 8120A;
  4. the number of DERCs used during the ozone season and non-ozone season as well as documentation attesting to the fact that approved DERCs used during the ozone season were generated during the ozone season. (Generator certification of this fact shall be sufficient.)

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5. Sikorsky shall maintain and submit such records to the Commissioner in accordance with § 22a-174-22 of RCSA. [paragraph B.3 of Trading Agreement and Order No. 8120A]
- v. The permittee shall retain records and supporting documentation as described in Trading Agreement and Order 8120A for a minimum of five years, commencing on the date such records were created. The permittee shall provide the records specified above to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner. All records shall be maintained in accordance with §§ 22a-174-4 and 22a-174-22 of RCSA [paragraph B.4 of Trading Agreement and Order 8120A]
- vi. At a minimum, DERCs required shall be adjusted upwards by at least 100% if DERCs are not in the permittee's possession prior to use. However, based on the gravity of the non-compliance, the Commissioner may require additional upward adjustment. [paragraph B.7 of Trading Agreement and Order No. 8120A]
- vii. Exceedance of an established FLER shall subject the permittee to make restitution by matching the quantity of emissions ("true up") caused by the exceedance plus a 100% premium penalty. The true up in tons of DERCs shall be equal to the FLER exceedance in lbs/MMBtu, multiplied by the total heat input during the period of non-compliance divided by 2000 lbs/ton. If the period of non-compliance is not known, the time period from the completion of the last/previous Department witnessed stack test through the date compliance is achieved as approved by the Commissioner shall be used. However, based on the gravity of the noncompliance, the Commissioner may require additional upward adjustment. [paragraph B.9 of Trading Agreement and Order No. 8120A]

#### C. EMISSION UNIT GEU 003 (Caterpillar 3412 Emergency Engine & Fire Pumps)

Table III.C: EMISSION UNIT GEU 003 (Caterpillar 3412 Emergency Engine & Fire Pumps)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	Operating Hours	Each engine shall not exceed 300 hours during any twelve (12) month rolling aggregate.	RCSA § 22a-174-3b(e)(2)(C)	C.1
SOS-1	SO <sub>x</sub>	The sulfur content in the fuel shall not exceed 0.3% by weight (dry basis).	RCSA § 22a-174-3b(e)(2)(D)	C.2

##### C.1 Operating Hours (EU 011)

###### C.1.1 Monitoring and Testing Requirements

The permittee shall monitor engine hours.

###### C.1.2 Record Keeping Requirements

The permittee may make and maintain records of the hours of operation for each month and each twelve (12) month rolling aggregate. [RCSA § 22a-174-3b(e)(4)]

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#### C.1.3 Reporting Requirements

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII of this permit]

#### **C.2 SO<sub>x</sub> (EU 011)**

##### C.2.1 Monitoring and Testing Requirements

The Commissioner may require the permittee to analyze for the sulfur content of liquid fuels, which shall be done according to the most current American Society for Testing and Materials, methods D 139 or D 1552 [RCSA § 22a-174-5(b)(1)].

##### C.2.2 Record Keeping Requirements

The permittee shall make and keep the following records for a minimum of five (5) years commencing on the date such records were created. The permittee shall maintain, with respect to each shipment of liquid fuel to be used in this emissions unit authorized hereunder, a shipping receipt and certification from the fuel supplier certifying the name of the fuel supplier, type of fuel delivered, API gravity of such fuel, the percentage of sulfur in such fuel, by weight, dry basis, and the method used by the fuel supplier to determine the sulfur content of such fuel. [RCSA § 22a-174-19(a)(5)]; or, a copy of a current contract with the fuel supplier supplying the fuel that includes the name of the fuel supplier, the type or grade of fuel delivered, and the sulfur content of the fuel [RCSA § 22a-174-33(j)(1)(K)(ii)].

##### C.2.3 Reporting Requirements

The Commissioner may require the permittee to submit a fuel analysis, results of stack sampling, or both, prepared at the expense of the merchant or user, to ensure compliance with the limitation in Table III.I. Such information shall be submitted to the Commissioner within thirty days of request. [RCSA § 22a-174-19(a)(5)]

#### **D. EMISSION UNITS GEU 004 (Hand Wiping Operations)**

<b>Table III.D: EMISSION UNITS GEU 004 (Hand Wiping Operations)</b>				
<b>Operating Scenarios Identification</b>	<b>Pollutants or Process Parameters</b>	<b>Limitations or Restrictions</b>	<b>Applicable Regulatory References/ Citations</b>	<b>Compliance Demonstration Condition Number</b>
SOS-1	Housekeeping Measures	Comply with Option 1 or 2 as outlined in 40 CFR 63.744(a)	40 CFR 63.744(a)	D.1
SOS-1	Hand Wiping Operations	Comply with Option 1, 2 or 3 as outlined in 40 CFR 63.744(b)	40 CFR 63.744(b)	D.2

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#### **D.1 Housekeeping Measures (GEU 004)**

##### **D.1.1 Cleaning Solvent Requirements**

The permittee shall comply with Option 1 or Option 2 as outlined below:

- a. Option 1: The permittee shall use cleaning solvents that meet one of the requirements as specified in paragraphs D.1.1(a)(i) or D.1.1(a)(ii) below or contains HAP and VOC below the de minimis levels specified in 40 CFR 63.741(f): [40 CFR 63.744(a)]

Meet one of the following composition requirements;

- i. Aqueous - Cleaning solvents in which water is the primary ingredient ( $\geq 80$  percent of cleaning solvent solution as applied must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives, such as organic solvents (e.g., high boiling point alcohols), builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than 93 deg.C (200 deg. F) (as reported by the manufacturer), and the solution must be miscible with water. [Table 1 of 40 CFR 63.744(b)(1)]
  - ii. Hydrocarbon-based - Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20 deg.C (3.75 in. H<sub>2</sub>O and 68 deg.F). These cleaners also contain no HAP. [Table 1 of 40 CFR 63.744(b)]
- b. Option 2: The permittee shall do the following if the permittee uses a solvent that doesn't meet the requirements in Option 1: [40 CFR 63.744(a)]
    - i. Place solvent-laden cloth, paper, or other absorbent applicators in bags or other closed containers after finishing using them (cotton tipped swabs used for very small cleaning operations are exempt from this requirement). Keep containers closed at all times, except when depositing or removing materials (cotton tipped swabs used for very small cleaning operations are exempt from this requirement). [40 CFR 63.744(a)(1)]
    - ii. Store fresh and spent solvents in closed containers (except semi-aqueous cleaners). [40 CFR 63.744(a)(2)]
    - iii. Handle and transfer solvents to, or from cleaning operations, and to waste handling areas in a manner that minimizes spills. [40 CFR 63.744(a)(3)]

##### **D.1.2 Record Keeping Requirements**

The permittee shall keep the following records for each cleaning solvent used for all options outlined in § D.1.1 of this permit: [40 CFR 63.752(b)(1)]

- a. name of the product used;
- b. vapor pressure; and
- c. documentation showing the organic HAP constituents

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#### **D.1.3 Reporting Requirements**

The permittee shall submit semiannual reports for all options as required in § D.1.1 of this permit every 6 months from the date of notification of compliance status which includes: [40 CFR 63.753(b)]

- a. if the operation has been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance;
- b. the statement shall be signed by the authorized official as required in § 22a-174-2a(a) of RCSA.

#### **D.2 Hand Wiping Operations (GEU 004)**

##### **D.2.1 Compliance**

The permittee shall use a cleaning solvent with a composite vapor pressure of 24.1 in. H<sub>2</sub>O (45 mm Hg) or less at 68 degrees F (20 degrees C). [40 CFR 63.744(b)(2)]. Determine composite vapor pressure by following 40 CFR 63.750(b).

##### **D.2.2 Record Keeping Requirements**

The permittee shall keep the following records: [40 CFR 63.752(b)(3)]

- a. name of each cleaning solvent used;
- b. composite vapor pressure of each cleaning solvent used;
- c. all vapor pressure test results (if appropriate), data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
- d. the amount (in gallons) of each cleaning solvent used each month at each operation.

If a cleaning solvent used in an exempt hand-wipe cleaning operation doesn't conform to the vapor pressure or composition requirements, the permittee shall record all of the following: [40 CFR 63.752(b)(4)]

- a. The identity and amount (in gallons) of each cleaning solvent used each month at each operation.
- b. A list of exempt operations in which these solvents are being used.

##### **D.2.3 Reporting Requirements**

The permittee shall report all of the following information semiannually (every 6 months from the date of notification of compliance status): [40 CFR 63.753(b)]

The permittee shall report the following: [40 CFR 63.744(1), (2)]

- a. Any instance where a non-compliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation; and
- b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months,

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including evidence of their compliance.

#### E. EMISSION UNIT EU 005 (Depainting – Plastic Media Blast)

Table III.E: EMISSION UNIT EU 005 (Depainting - Plastic Media Blast)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	Depainting Operations	Option 2 using non-chemical based equipment	40 CFR 63.746(b)(2)	E.1

#### E.1 Depainting Operations (EU 005)

##### E.1.1 Compliance

The permittee shall operate and maintain the equipment according to the manufacturer's specifications. During periods of malfunctions of such equipment, the permittee may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP-free. [40 CFR 63.746(b)(2)]

##### E.1.2. Monitoring and Testing Requirements

The permittee shall:

- a. Maintain the system in good working order; [40 CFR 63.746(b)(4)(iii)(A)]
- b. Install a differential pressure gauge across the filter banks; [40 CFR 63.746(b)(4)(iii)(B)]
- c. Continuously monitor the pressure drop across the filter, and read and record the pressure drop once per shift; and [40 CFR 63.746(b)(4)(iii)(C)]
- d. Take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limits. [40 CFR 63.746(b)(4)(iii)(C)]

##### E.1.3. Record Keeping Requirements

The permittee shall record the following:

- a. If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 40 CFR 63.746(b)(1):
  - i. The names and types of non-chemical based equipment; and [40 CFR 63.752(e)(5)(i)]
  - ii. For periods of malfunction: [40 CFR 63.752(e)(5)(ii)]

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1. The non-chemical method or technique that malfunctioned;
  2. The date that the malfunction occurred;
  3. A description of the malfunction;
  4. The methods used to depaint aerospace vehicles during the malfunction period;
  5. The dates that these methods were begun and discontinued; and
  6. The date that the malfunction was corrected.
- b. The actual pressure drop across the particulate filters once each shift in which the depainting process is in operation. This log shall include the acceptable limit(s) of the pressure drop as specified by the filter manufacturer. [40 CFR 63.752(e)(7)]

#### **E.1.4. Reporting Requirements**

The permittee shall submit the following information:

- a. Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify:
- i. Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in 40 CFR 63.746 (a), (b)(3), and (b)(5). [40 CFR 63.753(d)(1)(i)]
  - ii. Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed; [40 CFR 63.753(d)(1)(ii)]
  - iii. Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed; [40 CFR 63.753(d)(1)(v)]
  - iv. For periods of malfunctions: [40 CFR 63.753(d)(1)(vi)]
    1. The non-chemical method or technique that malfunctioned;
    2. The date that the malfunction occurred;
    3. A description of the malfunction;
    4. The methods used to depaint aerospace vehicles during the malfunction period;
    5. The dates that these methods were begun and discontinued; and
    6. The date that the malfunction was corrected;
  - v. All periods where a nonchemical depainting operation subject to 40 CFR 63.746(b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop or recommended booth parameter(s) was outside the limit(s) specified by the filter manufacturer or in locally prepared operational procedures; [40 CFR 63.753(d)(1)(vii)]
  - vi. A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and [40 CFR 63.753(d)(1)(viii)]
  - vii. If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards. [40 CFR 63.753(d)(1)(ix)]



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- b. Annual reports occurring every 12 months from the date of the notification of compliance status that identify:
  - i. The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in 40 CFR 63.746(b)(3); and [40 CFR 63.753(d)(2)]
  - ii. The number of times the pressure drop limit(s) for each filter system was outside the limit specified by the filter manufacturer or in locally prepared operating procedures.

#### F. EMISSION UNITS GEU 006 (Cold Cleaning Tanks)

Table III.F: EMISSION UNITS GEU 006 (Cold Cleaning Tanks)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	Cold Cleaning Unit Design and Operating Requirements	Equip the cleaning device with a cover designed so that it can be easily operated with one hand.	RCSA § 22a-174-20(l)(3)(A)	F.1

##### F.1.1. Compliance Requirements

The permittee shall meet the following requirements:

- a. Equip the cleaning device with a facility for draining cleaned parts constructed internally so that parts are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system. [RCSA § 22a-174-20(l)(3)(B)]
- b. Store waste degreasing solvent only in covered containers and not dispose of waste degreasing solvent or transfer it to another party, in a manner such that greater than 20 percent of the waste degreasing solvent (by weight) can evaporate into the atmosphere. [RCSA § 22a-174-20(l)(3)(C)]
- c. Close the cover whenever parts are not being handled in the cleaner for two (2) minutes or more, or when the device is not in use. [RCSA § 22a-174-20(l)(3)(D)]
- d. Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer. [RCSA § 22a-174-20(l)(3)(E)]
- e. If used, supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure which does not exceed ten (10) pounds per square inch as measured at the pump outlet and perform such spraying within the confines of the cold cleaning unit. [RCSA § 22a-174-20(l)(3)(F)]
- f. Install one of the following control devices if the solvent vapor pressure is greater than 4.3 kilo pascals (33 millimeters of mercury or 0.6 pounds per square inch) measured at 38 degrees Celsius (100 degrees Fahrenheit) or if the solvent is heated above 50 degrees Celsius (120 degrees Fahrenheit):

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- i. freeboard that gives a freeboard ratio greater than or equal to 0.7; . [RCSA § 22a-174-20(l)(3)(G)(i)]
- ii. water cover (solvent must be insoluble in and heavier than water); or . [RCSA § 22a-174-20(l)(3)(G)(ii)]
- iii. other systems of equivalent control, equal to that of a "refrigerated chiller" or carbon adsorption approved by the commissioner by permit or order. . [RCSA § 22a-174-20(l)(3)(G)(iii)]
- g. Minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between 1 and 2 meters upwind, and at the same elevation as the tank lip. [RCSA § 22a-174-20(l)(3)(H)]
- h. Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. [RCSA § 22a-174-20(l)(3)(I)]
- i. Provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements. [RCSA § 22a-174-20(l)(3)(J)]

#### **F.1.2 Record Keeping Requirements**

Maintain a monthly record of the amount of solvent added to each unit and keep such record for a minimum of five (5) years after such record is made. [RCSA § 22a-174-20(l)(3)(K), 33(o)(2)]

#### **F.1.3. Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII of this permit]

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#### G. EMISSION UNITS GEU 007, AND EMISSION UNIT EU 009 (Coating Operations and Nital-Etch Tank)

Table III.G: EMISSION UNITS GEU 007, AND EU 009 (Coating Operations and Nital-Etch Tank)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/Citations	Compliance Demonstration Condition Number
SOS-1	Coating Credits and Nital-Etch VOC credits	The Sum of Monthly Coating Credits (GEU 007) plus Monthly Nital-Etch (EU 009) credits shall be greater than Monthly excess emissions generated.	State Order 8246	G.1
	VOC	No more than 237 pounds of VOC per day No more than 55 gallons, as applied, of any combination of non-compliant coatings during any twelve (12) consecutive month period.		
		No more than 800 pounds VOC per day for Small Parts, Cell #1, Cell #2, or Cell #3 No more than 146 tons VOC per year for Small Parts, Cell #1, Cell #2, or Cell #3	Operating Permits 178-0035 –178-0038	G.2
		No more than 6.07 tons VOC per year for Paint Shop #1 Blades	Operating Permit 178-0078	
		No more than 5 tons VOC per year for VH Parts #4 or Conformal Coatings Booths	GPSC Permits 178-0077, 178-0081	G.3
	PM <sub>10</sub>	No more than 3 tons PM <sub>10</sub> per year for VH Parts #4 or Conformal Coatings Booths	GPSC Permits 178-0077, 178-0081	G.3
	VOC	No more than 2.9 pounds VOC per gallon of primer No more than 3.5 pounds VOC per gallon of topcoat	40 CFR 63, Subpart GG	G.4
	HAP	No more than 2.9 pounds HAP per gallon of primer No more than 3.5 pounds HAP per gallon of topcoat	40 CFR 63, Subpart GG	G.5
	VOC	The Aerospace CTG defines over 50 specialty coatings and establishes their VOC limits. Non-compliant specialty coatings subject to 200 gallon per year low use exemption.	RCSA 22a-174-32, Aerospace Manufacturing and Rework CTG (EPA-453/R-97-004)	G.6
		No more than 4.3 pounds per gallon of coating, excluding water and exempt volatile organic compounds listed in 40 CFR 51.100(s) as amended from time to time, delivered to a coating applicator that applies a clear coat; No more than 3.5 pounds per gallon of coating, excluding water and exempt volatile organic compounds listed in 40 CFR 51.100(s) as amended from time to time, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 90 degrees C (194 degrees F);	RCSA § 22a-174-20(s), RCSA § 22a-174-1(115)	G.7

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#### G. EMISSION UNITS GEU 007, AND EMISSION UNIT EU 009 (Coating Operations and Nital-Etch Tank), continued

Table III.G: EMISSION UNITS GEU 007, AND EU 009 (Coating Operations and Nital-Etch Tank)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/Citations	Compliance Demonstration Condition Number
SOS-1	VOC	No more than 3.5 pounds per gallon of coating, excluding water and exempt volatile organic compounds listed in 40 CFR 51.100(s) as amended from time to time, delivered to a coating applicator that applies extreme performance coatings; and No more than 3.0 pounds per gallon of coating, excluding water and exempt volatile organic compounds listed in 40 CFR 51.100(s) as amended from time to time, delivered to a coating applicator for all other coatings, adhesives, fillers or sealants and coating application systems	RCSA § 22a-174-20(s), RCSA § 22a-174-1(115)	G.7
SOS-1	VOC	No more than 6.3 pounds VOC per gallon, as applied, for Dyescan Booth	RCSA § 22a-174-3b(g)(1)(A)	G.8
	HAPs	No more than 6.3 pounds HAP per gallon, as applied, for Dyescan Booth	RCSA § 22a-174-3b(g)(1)(B)	G.9
	Material Usage	Dyescan Booth coating and solvent usage, including diluents and cleanup solvents but excluding water, shall not, in any twelve (12) month rolling aggregate, exceed 3,000 gallons	RCSA § 22a-174-3b(g)(1)(C)	G.10

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#### **G.1 VOC (GEU 007)**

##### G.1.1 Coating Credits

Coating Credits are created by the reformulation of coatings below the allowable levels that were established in the alternative emission reduction plan (AERP) which was required pursuant to § 22a-174-20(cc)(1) of RCSA. The AERP baseline emissions are the lower of the RACT limits established in § 22a-174-20(s)(3) of the RCSA, the Aerospace Manufacturing and Rework CTG (EPA-453/R-97-004) or the actual VOC content of the coating during the baseline years of 2000-2001. Coating credits shall be calculated using the following formula: [§ B.3.a of Consent Order 8246]

MONTHLY COATING CREDITS = MONTHLY ALLOWABLE EMISSIONS - MONTHLY ACTUAL EMISSIONS

Where:

MONTHLY ACTUAL EMISSIONS= (gallons coatings used per month<sup>1</sup>) x (actual VOC content of coating<sup>2</sup>)

MONTHLY ALLOWABLE EMISSIONS= (gallons of coatings used per month<sup>1</sup>) x (AERP baseline limit<sup>2</sup>)

<sup>1</sup> determined on a gallons of solids applied basis

<sup>2</sup> determined on a lbs VOC per gallon solids applied basis

##### G.1.2 Excess Emissions

Excess emissions are generated by using coatings that contain VOCs in concentrations greater than the RACT limits established in paragraphs B.1 and B.2 of Consent Order 8246. The monthly determination of exempt coatings shall be made in accordance with the procedures outlined in paragraph B.3.f of Consent Order 8246 prior to performing the calculation of excess emissions. Excess emissions shall be determined by using the following formula: [§ B.3.b of Consent Order 8246]

MONTHLY EXCESS EMISSIONS= MONTHLY ACTUAL EMISSIONS - MONTHLY ALLOWABLE EMISSIONS

Where:

MONTHLY ACTUAL EMISSIONS= (gallons coatings used per month<sup>1</sup>) x (actual VOC content of coating<sup>2</sup>)

MONTHLY ALLOWABLE EMISSIONS= (gallons of coatings used per month<sup>1</sup>) x (RACT emissions limit<sup>2</sup>)

<sup>1</sup> determined on a gallons of solids applied basis

<sup>2</sup> determined on a lbs VOC per gallon solids applied basis

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#### G.1.3 Nital-Etch Credits

Average baseline VOC emissions for the calendar years 2000 and 2001 were 2.94 tons/year (490 lbs per month). Sikorsky has reformulated the Nital-Etch solution and, as of July 2002, has reduced the alcohol content of the Nital-Etch solution to 50% by volume. Monthly Nital-Etch credits shall be generated by calculating the actual VOC emissions for the period and determining the VOC emissions reductions during the period according to the following formula: [§ B.3.c of Consent Order 8246]

MONTHLY NITAL-ETCH CREDITS= (490 lbs. VOC per month – [(Gallons of Alcohol added per month x lbs VOC/gallon alcohol <sup>1</sup>) x (1-(capture efficiency x control efficiency<sup>2</sup>))])

<sup>1</sup> Determined by using the current VOC content of the Nital-Etch solution

<sup>2</sup> Control efficiency shall be determined by the emissions testing described in paragraph B.4 of Order 8246. In the absence of control equipment, or during periods of control equipment malfunction, this term shall equal zero.

These credits are to be generated only while the Nital-Etch operation is being used to inspect surface temper, as described in paragraph A.4 of Order 8246. These credits shall end when this operation is shut-down, substituted with any other procedure, moved from the facility or otherwise becomes inactive. Sikorsky shall submit a letter to the Commissioner, informing the Department of any such change in the operation of the Nital-Etch.

#### G.1.4 Compliance Determination

The sum of the MONTHLY COATING CREDITS plus the MONTHLY NITAL-ETCH CREDITS shall be greater than or equal to the MONTHLY EXCESS EMISSIONS generated. Compliance with § 22a-174-20(s)(3) is determined using the following formula: [§ B.3.d of Consent Order 8246]

$(0.90^1) \times (\text{COATING CREDITS} + \text{NITAL-ETCH CREDITS}) \geq \text{EXCESS EMISSIONS}$

<sup>1</sup> where a 10% discount of all emission reductions is the chosen method to comply with the environmental benefit principle of the EIP.

Compliance with this paragraph shall be determined using an averaging period of thirty (30) days. The definition of thirty (30) days shall be one calendar month ("the period"). Credits generated within the period can only be used during that period. No credits will be rolled over to subsequent periods.

#### G.1.5 Exempt Coatings

Usage of exempt coatings shall be recorded in accordance with § 22a-174-20(aa) of RCSA. The following steps are to be followed when determining the quantity of exempt coatings for the current month:

- a. Calculate the gallons of exempt coating used during the previous eleven (11) months, [§ B.3.f.i of Consent Order 8246]
- b. If this total is less than 55 gallons, then determine the amount of non-compliant coatings to be considered exempt coatings for the current month, not to exceed 55 gallons for the total of the eleven months preceding this month plus the current month. [§ B.3.f.ii of Consent Order 8246]

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- c. The gallons of exempt coatings allocated to the current month will be exempted from the calculation of actual or allowable emissions totals for that month. [§ B.3.f.iii of Consent Order 8246]
- d. The remaining quantity of non-compliant coatings must be included in the calculation of excess emissions in paragraph B.3.b of Consent Order 8246. [§ B.3.f.iv of Consent Order 8246]

#### **G.1.6 Emissions Testing and Monitoring**

Sikorsky shall follow the testing and monitoring procedures outlined below:

- a. Within sixty (60) days of the installation of a control device on the Nital-Etch operation, Sikorsky shall submit to the Commissioner for his review and written approval an Intent to Test (“ITT”) protocol for such emissions testing. The ITT protocol shall include at least:
  - i. The Department’s Bureau of Air Management Test Form No.1, “Intent to Test”; [§ B.4.a.i of Consent Order 8246]
  - ii. A detailed description of all aspects of facility operations and of any air pollutant control equipment in use, which may affect emissions testing results, and how and when such facility operations and control equipment will be monitored; [§ B.4.a.ii of Consent Order 8246]
  - iii. A detailed description of each emissions testing methodology to be utilized, provided that all such methodologies shall conform to those approved by the U.S. Environmental Protection Agency and the Commissioner; and [§ B.4.a.iii of Consent Order 8246]
  - iv. A description of each discharge point at which emissions testing is to be conducted. [§ B.4.a.iv of Consent Order 8246]
- b. Sikorsky shall provide to the Commissioner any information that the Commissioner deems necessary to review Sikorsky’s ITT test protocol within five days of a request by the Commissioner, or within such shorter time as the Commissioner may require. [§ B.4.b of Consent Order 8246]
- c. Emissions testing shall be conducted in accordance with the ITT protocol approved by the Commissioner. [§ B.4.c of Consent Order 8246]
- d. Sikorsky shall schedule all emissions testing so as to allow the Commissioner to be present during such testing and to independently verify relevant facility operations, air pollution control equipment parameters, and testing procedures. [§ B.4.d of Consent Order 8246]
- e. Within 30 days of completing any emissions testing approved by the Commissioner, Sikorsky shall submit to the Commissioner a written report providing the results of the testing allowed by Order 8246. Within 15 days of a notice from the Commissioner indicating any deficiencies in such report, Sikorsky shall submit a revised report to the Commissioner. [§ B.4.e of Consent Order 8246]
- f. Within 15 days of a written request from the Commissioner, Sikorsky shall submit any additional data from the tests allowed by Order 8246. [§ B.4.f of Consent Order 8246]

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- g. Sikorsky shall install, calibrate, maintain and operate the control equipment, in accordance with the manufacturer's written recommendations and specifications. Sikorsky shall install and operate all necessary monitoring equipment to ensure that the tested control efficiency is being achieved at all times. Sikorsky shall maintain the following records for a period of not less than 5 years, to be made available to the Commissioner upon request:
  - i. Records of periods of operation during which the parameter boundaries established during the most recent performance test are exceeded. [§ B.4.g.i of Consent Order 8246]
  - ii. A log of operating time for the capture system, control device, monitoring equipment, and the Nital-Etch tank. [§ B.4.g.ii of Consent Order 8246]
  - iii. A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages. [§ B.4.g.iii of Consent Order 8246]
- h. Written reports of control equipment malfunctions and any other upset condition(s) shall be submitted to the Department in writing within 14 calendar days. Such reports shall contain an account of the measures taken to correct such equipment malfunctions as well as the degree of success in correcting the problem. Sikorsky shall also develop a written plan detailing process and control equipment startup and shutdown procedures as well as equipment maintenance procedures to be employed in the event of malfunction or upset of the control equipment. [§ B.4.h of Consent Order 8246]

#### **G.1.7 Record Keeping Requirements**

- a. Sikorsky shall maintain daily records of all coatings and diluents used in accordance with § 22a-174-20(aa) of the Regulations or any future applicable regulatory requirements. Such records shall be kept for each individual coating operation and must contain the following information:
  - i. A description of the coating including the coating name and the coating density in pounds per gallon; [§ B.5.a.i of Consent Order 8246]
  - ii. Volatile organic compound content by weight; [§ B.5.a.ii of Consent Order 8246]
  - iii. Water and exempt volatile organic compound content by weight; [§ B.5.a.iii of Consent Order 8246]
  - iv. Amount of each coating used in gallons; [§ B.5.a.iv of Consent Order 8246]
  - v. Total amount of diluent used for each coating in pounds and in gallons. [§ B.5.a.v of Consent Order 8246]
  - vi. Total lbs of VOC emitted from all coating operations; [§ B.5.a.vi of Consent Order 8246]
  - vii. Lbs of VOC per gallon of coating excluding water and exempt compound, as applied. [§ B.5.a.vii of Consent Order 8246]



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- b. On a Monthly Summary Sheet, Sikorsky shall record the following parameters for all subject metal coatings and the Nital-Etch:
  - i. Pounds of actual and allowable VOCs emitted each month for the previous 12-month period; [§ B.5.b.i of Consent Order 8246]
  - ii. Total pounds of actual and allowable VOCs emitted during the previous 12-month period; [§ B.5.b.ii of Consent Order 8246]
  - iii. Gallons (as applied) of exempt coatings used each month for the previous 12-month period; [§ B.5.b.iii of Consent Order 8246]
  - iv. Total gallons (as applied) of exempt coatings used during the previous 12-month period. [§ B.5.b.iv of Consent Order 8246]
  - v. Pounds of actual VOCs emitted from the Nital-Etch each month for the previous 12-month period. [§ B.5.b.v of Consent Order 8246]
  - vi. Total pounds of actual VOCs emitted from the Nital-Etch during the previous 12-month period. [§ B.5.b.vi of Consent Order 8246]
- c. Sikorsky shall maintain the daily records and Monthly Summary Sheets for all coatings and the Nital-Etch process used in Consent Order 8246 at the facility for not less than five (5) years from the date that the forms were completed. [§ B.5.c of Consent Order 8246]
- d. Sikorsky shall maintain a master list of all paints and diluents that is available on request by the Department. Any changes in the VOC content of the coatings shall be noted in the master list upon occurrence and reported to the Department annually. [§ B.5.d of Consent Order 8246]
- e. For coatings that are not waterborne (water-reducible), determine the VOC content of each formulation (less water and less exempt solvents) as applied using manufacturer's supplied data or Method 24 of 40 CFR Part 60, Appendix A. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis. For water-borne (water-reducible) coatings, manufacturer's supplied data alone can be used to determine the VOC content of each formulation. Water-borne (water-reducible) coatings are defined as coatings, which contain more than 5 percent water by weight as applied in its volatile fraction. [§ B.5.e of Consent Order 8246]
- f. Sikorsky shall, on a monthly basis, determine compliance with the terms of Consent Order 8246, including performing the calculation indicated in paragraph B.3.d of Consent Order 8246 and notify the Department within 2 days of discovering any instance of non-compliance. [§ B.5.f of Consent Order 8246]

#### **G.1.8 Future VOC RACT.**

If any new VOC emitting operations are added to the facility, Sikorsky shall perform a New Source Review evaluation in accordance with § 22a-174-3a, -3b, or -3c of the Regulations, and a § 22a-174-32 VOC RACT applicability determination. Notwithstanding the above, if Sikorsky applies coatings in any of the operations not subject to § 22a-174-20(s), then the VOC contents shall not exceed the limits established by the Aerospace Manufacturing and Rework CTG (EPA-453/R-97-004). Should Sikorsky

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become subject to the VOC RACT requirements of § 22a-174-32 of the Regulations, then Sikorsky shall submit a VOC RACT compliance plan. [§ B.6 of Consent Order 8246]

#### **G.1.9 Use of New Coatings.**

Sikorsky may add new coatings, as approved by the Commissioner, provided that the procedures below are followed:

- a. For the case that Sikorsky replaces a coating currently used by Sikorsky with a new coating:
  - i. If the new coating is to generate credits, then the AERP baseline limit used to determine MONTHLY ALLOWABLE EMISSIONS, as defined in paragraph B.3.a of Consent Order 8246, shall be the lower of the RACT limits specified in paragraphs B.1 and B.2 of Consent Order 8246, or the actual VOC content of the replaced coating in the baseline year, whichever is lower. [§ B.7.a.i of Consent Order 8246]
  - ii. If the new coating has a VOC content in excess of the RACT emission limit specified in paragraphs B.1 and B.2 of Consent Order 8246, then the emissions from this coating shall be included in the calculation of excess emissions outlined in paragraph B.3.b of Consent Order 8246. [§ B.7.a.ii of Consent Order 8246]
- b. For the case of a new coating operation that does not replace a coating currently used by Sikorsky:
  - i. If the VOC content of the coating is higher than the RACT emission limit specified in paragraphs B.1 and B.2 of Consent Order 8246, then the emissions from this coating shall be included in the calculation of excess emissions contained in paragraph B.3.b of Consent Order. 8246 [§ B.7.b.i of Consent Order 8246]
  - ii. If the VOC content of the new coating is lower than the RACT emission limit specified in paragraphs B.1 and B.2 of Consent Order 8246, then the credits may not be generated from the use of this coating. [§ B.7.b.ii of Consent Order 8246]
  - iii. If the VOC content of the new coating is later reformulated, then credits can be generated from the RACT emission limit specified in paragraphs B.1 and B.2 of Consent Order 8246, or the original VOC content, whichever is lower. [§ B.7.b.iii of Consent Order 8246]
- c. Within thirty (30) days after the use of a new coating, Sikorsky must notify the Commissioner in writing that it has begun using the new coating and submit a VOC data sheet for the new coating. [§ B.7.c of Consent Order 8246]

#### **G.1.10 Reporting Requirements**

Sikorsky shall submit to the Commissioner, postmarked within thirty-one (31) days after the end of each calendar year, the Monthly Summary Sheets from the previous calendar year and a summary of the daily emissions for the affected coating operations described in paragraph B.1 of Consent Order 8246. [§ B.9 of Consent Order 8246]

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#### **G.2 VOC Small Parts, Cell #1, Cell #2, Cell #3, Paint Shop #1 Blades (GEU 007)**

##### **G.2.1. Monitoring and Testing Requirements**

The permittee shall calculate VOC emissions by monitoring coating use on a daily, monthly and consecutive twelve (12) month basis. [Operating Permit 178-(0035-0038, 0078)]

##### **G.2.2 Record Keeping Requirements**

The following records shall be maintained by the permittee:

- a. Coating name. [§ VII.F of this permit]
- b. Gallons of coating applied. [§ VII.F of this permit]
- c. Pounds of VOC per gallon of coating. [§ VII.F of this permit]
- d. Pounds VOC emitted daily. [§ VII.F of this permit]
- e. Tons of VOC emitted annually. [§ VII.F of this permit]

The permittee shall make and keep records as described, for a minimum of five (5) years commencing on the date such records were created. [§ VII.F of this permit]

##### **G.2.3 Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII.E of this permit]

#### **G.3 VOC and PM10 VH Parts #4 and Conformal Coatings Booths (GEU 007)**

##### **G.3.1 Operating Conditions**

- a. Emissions of VOC from the subject activity, including emissions from the cleanup of any article associated with any such activity, shall be less than five tons during every consecutive twelve months. [§ 5(a)(1) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- b. Emissions of VOC from the subject activity, including emissions from the cleanup of any article associated with any such activity, shall be in compliance with all applicable limitations provided in RCSCA § 22a-174-20, Control of Organic Compound Emissions. [§ 5(a)(2) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- c. Emissions of PM10 from the subject activity shall be less than three tons during every consecutive twelve months. [§ 5(a)(3) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- d. The subject activity shall comply with all applicable MASC limits calculated in accordance with RCSCA § 22a-174-29, Tables 29-1, 29-2, and 29-3. A coating, solvent, thinner, or other compound used in an authorized activity, either for production or on a trial basis, which will emit a hazardous

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air pollutant may be utilized only if the emissions from such activity complies with the applicable MASC. [§ 5(a)(4) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

- e. The subject activity shall comply with all applicable New Source Performance Standards, 40 CFR Part 60, National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61, and/or MACT standards, 40 CFR Part 63. [§ 5(a)(5) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- f. Any part to be used in the subject activity that must be cleaned prior to base coat materials application shall be hand-wiped with a rag or cloth containing the cleaning surface preparation product. [§ 5(a)(6) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- g. Any applicator used in connection with the authorized activity shall have a transfer efficiency guaranteed by the manufacturer of at least sixty-five percent (65%). [§ 5(a)(7) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- h. Such an applicator shall be cleaned in a device that:
  - i. minimizes to the maximum extent possible solvent evaporation during cleaning, rinsing, and draining operations;
  - ii. collects spent solvent so that it is available for proper disposal or recycling; and
  - iii. is kept closed at all times when not in use.

[§ 5(a)(8) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

- i. Such an applicator shall be cleaned in a device that:
  - i. recirculates solvent during the cleaning operation so that the solvent is reused until it no longer cleans satisfactorily;
  - ii. discharges un-atomized cleaning solvent into a waste container;
  - iii. cleans a disassembled applicator in a vat; or
  - iv. discharges atomized cleaning solvent into a waste container that is fitted with a device designed to capture emissions.

[§ 5(a)(9) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

- j. If particulate emissions are emitted, a coating shall be applied in a location such that the air stream from the authorized activity passes through: [§ 5(a)(10) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
  - i. a dry filter media system having a manufacturer's guaranteed control efficiency of at least

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ninety-seven percent (97%);

- ii. a waterwash system having a manufacturer's guaranteed control efficiency of at least ninety-seven percent (97%); or
- iii. any other particulate control equipment having a manufacturer's guaranteed control efficiency of at least ninety-seven percent (97%).

[§ 5(a)(10) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

- k. Such particulate control system shall remain fully operational at all times when the applicator equipment is in use. [§ 5(a)(11) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- l. Any VOC control system used in conjunction with the authorized activity shall have an overall control efficiency guaranteed by the manufacturer of at least eighty-one (81%) unless a more stringent efficiency is required by RCSA § 22a-174-20. [§ 5(a)(12) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- m. Such VOC control system shall remain fully operational at all times when the applicator equipment is in use. [§ 5(a)(13) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- n. Every person involved in the authorized activity shall receive adequate training in the proper operation and maintenance of the applicator equipment and the applicator equipment cleaning device. [§ 5(a)(14) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- o. The permittee shall operate the spray gun(s), spray booth, filter media, and other equipment used in connection with the authorized activity in accordance with any and all instructions or recommendations by the manufacturer. [§ 5(a)(15) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- p. The following shall be stored in non-absorbent, non-leaking containers that are closed at all times except when being filled or emptied:
  - i. Fresh solvent, spent solvent, cloth, and paper which has been used for surface preparation or other solvent cleaning operations.
  - ii. Waste paint and sludge.

[§ 5(a)(16) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

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- q. Handling, storage, and disposal of all coatings and solvents shall be carried out in such a manner as to prevent to the maximum extent possible the evaporation of such coatings and solvents. [§ 5(a)(17) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- r. The permittee shall not cause or allow the emission from the subject activity of any substance or combination of substances which creates or contributes to an odor, in the ambient air, that constitutes a nuisance. [§ 5(a)(18) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- s. The permittee shall take reasonable precautions to prevent the emission of particulate matter from the subject activity. [§ 5(a)(19) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- t. The permittee shall ensure that the subject activity complies with all applicable control guidelines which the administrator may develop in accordance with § 108 of the federal Clean Air Act. [§ 5(a)(20) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

#### **G.3.2 Record Keeping Requirements**

The permittee shall maintain the following records pertaining to such activity: [§ 5(b)(1) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

- a. The aggregate amount, by volume, of each coating and solvent used each calendar month, and each consecutive twelve months; [§ 5(b)(1)(A) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- b. The amount of VOC emissions, in tons, during each calendar month and each consecutive twelve months; [§ 5(b)(1)(B) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- c. The amount of PM10 emissions, in tons, during each calendar month and each consecutive twelve months; [§ 5(b)(1)(C) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- d. Demonstration of compliance with RCSA § 22a-174-29, Tables 29-1, 29-2, and 29-3 with respect to all coatings and solvents used, as applied; [§ 5(b)(1)(D) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- e. The manufacturer's specifications and guarantees including without limitation control efficiency, for any VOC control system used; [§ 5(b)(1)(E) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- f. The manufacturer's specifications and guarantees including without limitation transfer efficiency, for each applicator used; [§ 5(b)(1)(F) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

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- g. The manufacturer's specifications, including without limitation collection efficiency, for any particulate control system used; [§ 5(b)(1)(G) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- h. The make and model of the VOC control system; [§ 5(b)(1)(H) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- i. With respect to each coating or solvent used, as applied:
  - i. the name and identification number;
  - ii. the VOC content, expressed in pounds per gallon;
  - iii. all material safety data sheets or technical data sheets;
  - iv. all records of purchasing, including without limitation purchase orders, invoices, and packing slips; and
  - v. all disposal manifests, including amount and type of material removed from the premises for disposal.[§ 5(b)(1)(I) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- j. With respect to any VOC control system used, a monthly log of operating hours including notations of:
  - i. breakdowns;
  - ii. upsets;
  - iii. repairs and maintenance; and any other deviations from design parameters.[§ 5(b)(1)(J) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- k. The manufacturer's instructions and recommendations for operation of spray guns, spray booths, filter media and any other equipment used in connection with the authorized activity. [§ 5(b)(1)(K) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]
- l. The manufacturer's guarantee concerning control efficiency of the particulate control equipment. [§ 5(b)(1)(L) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

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#### **G.3.3     Reporting Requirements**

Upon learning of a violation of a condition of this general permit, a permittee shall immediately take all reasonable action to determine the cause of such violation, correct such violation and mitigate its results, prevent further such violation and report in writing such violation and corrective action to the commissioner within five days of the permittee's learning of such violation. Such report shall be certified in accordance with sub§ 5(i) of the General Permit to Construct and/or Operate a New or Existing Surface Coating Operation. [§ 5(e) of General Permit to Construct and/or Operate a New or Existing Surface Coating Operation]

#### **G.4 VOC Primers/Topcoats (GEU 007)**

##### **G.4.1.     Application Equipment**

- a. The permittee shall apply all primers and topcoats using one or more of the following techniques:
  - i. Flow/curtain coat application; [40 CFR 63.745(f)(1)(i)]
  - ii. Dip coat application; [40 CFR 63.745(f)(1)(ii)]
  - iii. Roll coating; [40 CFR 63.745(f)(1)(iii)]
  - iv. Brush coating; [40 CFR 63.745(f)(1)(iv)]
  - v. Cotton-tipped swab application; [40 CFR 63.745(f)(1)(v)]
  - vi. Electrodeposition (dip) coating; [40 CFR 63.745(f)(1)(vi)]
  - vii. High volume low pressure (HVLP) spraying; [40 CFR 63.745(f)(1)(vii)]
  - viii. Electrostatic spray application; [40 CFR 63.745(f)(1)(viii)]
  - ix. Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in 40 CFR 63.750(i). [40 CFR 63.745(f)(1)(ix)]
- b. The permittee shall operate all application devices according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application methods. [40 CFR 63.745(f)(2)]

##### **G.4.2.     Monitoring and Testing Requirements**

The permittee shall monitor VOC content in primers and topcoats on a daily, monthly and consecutive twelve (12) month basis. [RCSA § 22a-174-33(j)(1)(K)(ii)]



### **Section III: Applicable Requirements and Compliance Demonstration**

#### **G.4.3 Record Keeping Requirements**

- a. The permittee shall fulfill all record keeping requirements specified in § 63.10(a), (b), (d) and (f). [40 CFR 63.752(a)]
- b. The permittee shall record the following information, as appropriate:
  - i. The name and VOC content as received and as applied of each primer and topcoat used at the facility. [40 CFR 63.752(c)(1)]
  - ii. For uncontrolled primers and topcoats that meet the organic VOC content limits in 40 CFR 63.745(c)(1) through (c)(4) without averaging: [40 CFR 63.752(c)(2)]
    1. The mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) ( $G_i$ ) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e)); [40 CFR 63.752(c)(2)(i)]
    2. All data, calculations, and test results (including EPA Method 24 results) used in determining the value  $G_i$ ; [40 CFR 63.752(c)(2)(ii)] and
    3. The volume (gal) of each coating formulation within each coating category used each month. [40 CFR 63.752(c)(2)(iii)]
  - iii. For VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied: [40 CFR 63.752(c)(3)]
    1. Annual purchase records of the total volume of each primer purchased; [40 CFR 63.752(c)(3)(i)] and
    2. All data, calculations, and test results (including EPA Method 24 results) used in determining the VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received. [40 CFR 63.752(c)(3)(ii)]

The permittee shall make and keep records as described, for a minimum of five (5) years commencing on the date such records were created. [§ VII.F of this permit]

#### **G.4.4 Reporting Requirements**

- a. Except as provided in paragraphs (a)(2) and (a)(3) of 40 CFR 63.753, the permittee shall fulfill the requirements contained in 40 CFR 63.9(a) through (e) and (h) through (j), Notification requirements, and 40 CFR 63.10(a), (b), (d), and (f), Record keeping and reporting requirements, of the General Provisions, 40 CFR part 63, subpart A. In addition to the requirements of § 63.9(h), the notification of compliance status shall include: [40 CFR 63.753(a)(1)]
  - i. Information detailing whether the source has operated within the specified ranges of its designated operating parameters. [40 CFR 63.753(a)(1)(i)]
  - ii. For each coating line, where averaging will be used along with the types of quantities of

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coatings the facility expects to use in the first year of operation. Averaging scheme shall be approved by the Administrator or delegated State authority and shall be included as part of the facility's Title V or Part 70 permit. [40 CFR 63.753(a)(1)(ii)]

- b. For the purposes of subpart GG of 40 CFR 63, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b)(2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b)(2), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notifications. [40 CFR 63.753(a)(2)]
- c. For the purposes of this subpart, the Administrator will notify the owner or operator in writing of approval or disapproval of the request for an adjustment to a particular time period or postmark deadline submitted under 40 CFR 63.9(i) within 30 calendar days of receiving sufficient information to evaluate the request, rather than 15 calendar days as provided for in 40 CFR 63.9(i)(3). [40 CFR 63.753(a)(3)]
- d. The permittee shall submit semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: [40 CFR 63.753(c)(1)]
  - i. For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of  $H_i$  and  $G_i$ , as recorded under 40 CFR 63.752(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in 40 CFR 63.745(c); [40 CFR 63.753(c)(1)(i)]
  - ii. All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures; [40 CFR 63.753(c)(1)(vi)]
  - iii. If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and, [40 CFR 63.753(c)(1)(vii)]
- e. Annual reports beginning 12 months after the date of the notification of compliance status listing the number of times the pressure drop or water flow rate for each dry filter or waterwash system, as applicable, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. [40 CFR 63.753(c)(2)]

#### **G.5 HAP Primers/Topcoats (GEU 007)**

##### **G.5.1. Application Equipment**

- a. The permittee shall apply all primers and topcoats using one or more of the following techniques:
  - i. Flow/curtain coat application; [40 CFR 63.745(f)(1)(i)]

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- ii. Dip coat application; [40 CFR 63.745(f)(1)(ii)]
  - iii. Roll coating; [40 CFR 63.745(f)(1)(iii)]
  - iv. Brush coating; [40 CFR 63.745(f)(1)(iv)]
  - v. Cotton-tipped swab application; [40 CFR 63.745(f)(1)(v)]
  - vi. Electrodeposition (dip) coating; [40 CFR 63.745(f)(1)(vi)]
  - vii. High volume low pressure (HVLP) spraying; [40 CFR 63.745(f)(1)(vii)]
  - viii. Electrostatic spray application; [40 CFR 63.745(f)(1)(viii)]
  - ix. Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in 40 CFR 63.750(i). [40 CFR 63.745(f)(1)(ix)]
- b. The permittee shall operate all application devices according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application methods. [40 CFR 63.745(f)(2)]

#### **G.5.2. Standard**

Except as provided in paragraph (g)(4) of 40 CFR 63.745, the permittee shall:

- a. Apply these coatings in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets. [40 CFR 63.745(g)(1)]
- b. Control the air stream from this operation as follows: [40 CFR 63.745(g)(2)]
  - i. For existing sources, the owner or operator must choose one of the following:
    - 1. Before exhausting it to the atmosphere, pass the air stream through a dry particulate filter system certified using the methods described in 40 CFR 63.750(o) to meet or exceed the efficiency data points in Tables 1 and 2 of 40 CFR 63.745; or [40 CFR 63.745(g)(2)(i)(A)]
    - 2. Before exhausting it to the atmosphere, pass the air stream through a waterwash system that shall remain in operation during all coating application operations; or [40 CFR 63.745(g)(2)(i)(B)]
  - ii. If a dry particulate filter system is used, the following requirements shall be met:
    - 1. Maintain the system in good working order; [40 CFR 63.745(g)(2)(iv)(A)]
    - 2. Install a differential pressure gauge across the filter banks; [40 CFR 63.745(g)(2)(iv)(B)]

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3. Continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift; [40 CFR 63.745(g)(2)(iv)(C)] and
  4. Take corrective action when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s). [40 CFR 63.745(g)(2)(iv)(D)]
- iii. If a conventional waterwash system is used, continuously monitor the water flow rate and read and record the water flow rate once per shift. If a pumpless system is used, continuously monitor the booth parameter(s) that indicate performance of the booth per the manufacturer's recommendations to maintain the booth within the acceptable operating efficiency range and read and record the parameters once per shift. [40 CFR 63.745(g)(2)(v)]
- c. If the pressure drop across the dry particulate filter system, as recorded pursuant to 40 CFR 63.752(d)(1), is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, shut down the operation immediately and take corrective action. If the water path in the waterwash system fails the visual continuity/flow characteristics check, or the water flow rate recorded pursuant to 40 CFR 63.752(d)(2) exceeds the limit(s) specified by the booth manufacturer or in locally prepared operating procedures, or the booth manufacturer's or locally prepared maintenance procedures for the filter or waterwash system have not been performed as scheduled, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop or water flow rate is returned within the specified limit(s). [40 CFR 63.745(g)(3)]
- d. The requirements of paragraphs G.5.2.b.i.1 through G.5.2.b.i.2 of this permit do not apply to the following:
- i. Touch-up of scratched surfaces or damaged paint; [40 CFR 63.745(g)(4)(i)]
  - ii. Hole daubing for fasteners; [40 CFR 63.745(g)(4)(ii)]
  - iii. Touch-up of trimmed edges; [40 CFR 63.745(g)(4)(iii)]
  - iv. Coating prior to joining dissimilar metal components; [40 CFR 63.745(g)(4)(iv)]
  - v. Stencil operations performed by brush or air brush; [40 CFR 63.745(g)(4)(v)]
  - vi. § joining; [40 CFR 63.745(g)(4)(vi)]
  - vii. Touch-up of bushings and other similar parts; [40 CFR 63.745(g)(4)(vii)]
  - viii. Sealant detackifying; [40 CFR 63.745(g)(4)(viii)]
  - ix. Painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth; [40 CFR 63.745(g)(4)(ix)] and
  - x. The use of hand-held spray can application methods. [40 CFR 63.745(g)(4)(x)]

#### **G.5.3. Monitoring and Testing Requirements**

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The permittee shall monitor HAP content in primers and topcoats on a daily, monthly and consecutive twelve (12) month basis. [RCSA § 22a-174-33(j)(1)(K)(ii)]

#### **G.5.4 Record Keeping Requirements**

- a. The permittee shall fulfill all record keeping requirements specified in § 63.10(a), (b), (d) and (f). [40 CFR 63.752(a)]
- b. The permittee shall record the following information, as appropriate:
  - i. For uncontrolled primers and topcoats that meet the organic HAP content limits in 40 CFR 63.745(c)(1) through (c)(4) without averaging: [40 CFR 63.752(c)(2)]
    1. The mass of organic HAP emitted per unit volume of coating as applied (less water) ( $H_i$ ) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e)); [40 CFR 63.752(c)(2)(i)]
    2. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of  $H_i$ ; [40 CFR 63.752(c)(2)(ii)] and
    3. The volume (gal) of each coating formulation within each coating category used each month. [40 CFR 63.752(c)(2)(iii)]
  - ii. For “low HAP content” uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied: [40 CFR 63.752(c)(3)]
    1. Annual purchase records of the total volume of each primer purchased; [40 CFR 63.752(c)(3)(i)] and
    2. All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine  $H_i$  if not applied as received. [40 CFR 63.752(c)(3)(ii)]
  - iii. For primers and topcoats that are controlled by a control device other than a carbon adsorber: [40 CFR 63.752(c)(5)]

The overall control efficiency of the control system (as determined using the procedures specified in 40 CFR 63.750(h)) and all test results, data, and calculations used in determining the overall control efficiency; [40 CFR 63.752(c)(5)(i)]

The permittee shall make and keep records as described, for a minimum of five (5) years commencing on the date such records were created. [§ VII.F of this permit]

#### **G.5.5 Reporting Requirements**

- a. Except as provided in paragraphs (2) and (3) of this §, the permittee shall fulfill the requirements contained in 40 CFR 63.9(a) through (e) and (h) through (j), Notification requirements, and 40

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CFR 63.10(a), (b), (d), and (f), Record keeping and reporting requirements, of the General Provisions, 40 CFR part 63, subpart A. In addition to the requirements of § 63.9(h), the notification of compliance status shall include: [40 CFR 63.753(a)(1)]

- b. Information detailing whether the source has operated within the specified ranges of its designated operating parameters. [40 CFR 63.753(a)(1)(i)]
- c. The permittee shall submit semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: [40 CFR 63.753(c)(1)]
  - i. For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of  $H_i$  and  $G_i$ , as recorded under 40 CFR 63.752(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in 40 CFR 63.745(c); [40 CFR 63.753(c)(1)(i)]
  - ii. For primers and topcoats where compliance is being achieved through the use of averaging, each value of  $H_a$  as recorded under 40 CFR 63.752(c)(4)(i), that exceeds the applicable organic HAP content limit specified in 40 CFR 63.745(c); [40 CFR 63.753(c)(1)(ii)]
  - iii. For control devices other than an incinerator or carbon adsorber, each exceedance of the operating parameter(s) established for the control device under the initial performance test during which compliance was demonstrated; [40 CFR 63.753(c)(1)(v)]
  - iv. All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures; [40 CFR 63.753(c)(1)(vi)]
  - v. If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and, [40 CFR 63.753(c)(1)(vii)]
- d. Annual reports beginning 12 months after the date of the notification of compliance status listing the number of times the pressure drop or water flow rate for each dry filter or waterwash system, as applicable, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. [40 CFR 63.753(c)(2)]

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#### **G.6 Specialty Coatings (GEU 007)**

##### **[ § G.6 applies to non-metal parts only]**

##### **G.6.1. Monitoring and Testing Requirements**

The permittee shall monitor VOC content in specialty coatings on a daily, monthly and consecutive twelve (12) month basis. [RCSA § 22a-174-33(j)(1)(K)(ii)]

##### **G.6.2 Record Keeping Requirements**

The following records shall be maintained by the permittee:

- a. Coating name. [§ VII.F of this permit]
- b. Gallons of coating applied. [§ VII.F of this permit]
- c. Pounds of VOC per gallon of specialty coating. [§ VII.F of this permit]

The permittee shall make and keep records as described, for a minimum of five (5) years commencing on the date such records were created. [§ VII.F of this permit]

##### **G.6.3 Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII.E of this permit]

#### **G.7 VOC (GEU 007)**

##### **G.7.1. Monitoring and Testing Requirements**

The permittee shall not emit VOC in excess of limits as defined in Table III.G of this permit. [RCSA § 22a-174-20(s)(3)]

##### **G.7.2 Record Keeping Requirements**

The following records shall be maintained by the permittee:

- a. Coating name. [§ VII.F of this permit]
- b. Gallons of coating applied. [§ VII.F of this permit]
- c. Pounds of VOC per gallon of coating. [§ VII.F of this permit]

##### **G.7.3 Reporting Requirements**

The permittee shall submit reports in accordance with the requirements of § VII.E of this permit. [§ VII.E of this permit]

#### **G.8 VOC Dyescan Booth (GEU 007)**

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#### **G.8.1     Record Keeping Requirements**

The permittee shall maintain records of pounds of VOC per gallon of coating, as applied in the Dyescan Booth, for each month and each twelve (12) month rolling aggregate. [RCSA § 22a-174-3b(g)(3)(B)]

#### **G.8.2     Reporting Requirements**

- a. The permittee shall make records available to the commissioner to inspect and copy upon request. [RCSA § 22a-174-3b(g)(2)(A)]
- b. The permittee shall maintain records for five (5) years from the date such records are created. [RCSA § 22a-174-3b(g)(2)(B)]

### **G.9 HAP Dyescan Booth (GEU 007)**

#### **G.9.1     Record Keeping Requirements**

The permittee shall maintain records of pounds of HAP per gallon of coating, as applied in the Dyescan Booth, for each month and each twelve (12) month rolling aggregate. [RCSA § 22a-174-3b(g)(3)(B)]

#### **G.9.2     Reporting Requirements**

- a. The permittee shall make records available to the commissioner to inspect and copy upon request. [RCSA § 22a-174-3b(g)(2)(A)]
- b. The permittee shall maintain records for five (5) years from the date such records are created. [RCSA § 22a-174-3b(g)(2)(B)]

### **G.10 VOC Dyescan Booth (GEU 007)**

#### **G.10.1     Record Keeping Requirements**

The permittee shall maintain records of the type and quantity of coating and solvent used in Dyescan Booth, in gallons, for each month and each twelve (12) month rolling aggregate. [RCSA § 22a-174-3b(g)(3)(A)]

#### **G.10.2     Reporting Requirements**

- a. The permittee shall make records available to the commissioner to inspect and copy upon request. [RCSA § 22a-174-3b(g)(2)(A)]
- b. The permittee shall maintain records for five (5) years from the date such records are created. [RCSA § 22a-174-3b(g)(2)(B)]



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#### H. EMISSION UNIT EU 008 (Anodize Tank)

Table III.H: EMISSION UNIT EU 008 (Anodize Tank) (Process Solutions Tank – Cr MACT >1000 Gallon)				
Operating Scenarios Identification	Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations	Compliance Demonstration Condition Number
SOS-1	Chromium	No more than 0.01 mg/dscm	40 CFR 63, Subpart N	H.1

##### H.1 Chromium (EU 008)

###### H.1.1. Standard

The permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm [40 CFR 63.342(d)(1)]

###### H.1.2 Work Practice Standards

- a.
  - i. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by paragraph (f)(3) of 40 CFR 63.342. [40 CFR 63.342(f)(1)(i)]
  - ii. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by paragraph (f)(3) of 40 CFR 63.342. [40 CFR 63.342(f)(1)(ii)]
- b.
  - i. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by paragraph (f)(3)(i) of 40 CFR, the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator. [40 CFR 63.342(f)(3)(iv)]
  - ii. The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan. [40 CFR 63.342(f)(3)(v)]

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- iii. To satisfy the requirements of paragraph (f)(3) 40 CFR 63.342, the owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this §. [40 CFR 63.342(f)(3)(vi)]

#### H.1.3 Compliance

- a. Monitoring to demonstrate continuous compliance.

The permittee shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified in this § for the air pollution control techniques expected to be used by the permittee. [40 CFR 63.343(c)]

- i. Composite mesh-pad systems.
  - 1. During the initial performance test, the permittee, complying with the emission limitations in 40 CFR 63.342 through the use of a composite mesh-pad system shall determine the outlet chromium concentration using the test methods and procedures in 40 CFR 63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in 40 CFR 63.344(d)(5). The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept  $\pm 1$  inch of water column from this value as the compliant range. [40 CFR 63.343(c)(1)(i)]
  - 2. On and after the date on which the initial performance test is required to be completed under 40 CFR 63.7, the permittee, shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm 1$  inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [40 CFR 63.343(c)(1)(ii)]

#### H.1.4 Record Keeping Requirements

- a. The permittee shall fulfill all record keeping requirements outlined in this § and in the General Provisions to 40 CFR part 63, according to the applicability of subpart A of 40 CFR 63, subpart N as identified in Table 1 of 40 CFR 63, subpart N. [40 CFR 63.346(a)]
- b. The permittee shall maintain the following records for such source: [40 CFR 63.346(b)]
  - i. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of § 63.342(f) and Table 1 of § 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. [40 CFR

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63.346(b)(1)]

- ii. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; [40 CFR 63.346(b)(2)]
- iii. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; [40 CFR 63.346(b)(3)]
- iv. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; [40 CFR 63.346(b)(4)]
- v. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by § 63.342(f)(3); [40 CFR 63.346(b)(5)]
- vi. Test reports documenting results of all performance tests; [40 CFR 63.346(b)(6)]
- vii. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of § 63.344(e); [40 CFR 63.346(b)(7)]
- viii. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; [40 CFR 63.346(b)(8)]
- ix. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; [40 CFR 63.346(b)(9)]
- x. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; [40 CFR 63.346(b)(10)]
- xi. The total process operating time of the affected source during the reporting period; [40 CFR 63.346(b)(11)]
- xii. Any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements, if the source has been granted a waiver under 40 CFR 63.10(f); and [40 CFR 63.346(b)(15)]
- xiii. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347. [40 CFR 63.346(b)(16)]
- c. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1). [40 CFR 63.346(c)]
- d. The permittee shall keep records associated with the operation and maintenance plan as identified in 40 CFR 63.346(b). [40 CFR 63.342(f)(3)(iv)]

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#### **H.1.5     Reporting Requirements**

- a. The permittee shall fulfill all reporting requirements outlined in this § and in the General Provisions to 40 CFR part 63, according to the applicability of subpart A as identified in Table 1 of 40 CFR 63, subpart N. These reports shall be made to the Administrator at the appropriate address as identified in 40 CFR 63.13 or to the delegated State authority. [40 CFR 63.347(a)]
  - i. Reports required by subpart A of this part and this § may be sent by U.S. mail, fax, or by another courier. [40 CFR 63.347(a)(1)]
    - 1. Submittals sent by U.S. mail shall be postmarked on or before the specified date. [40 CFR 63.347(a)(1)(i)]
    - 2. Submittals sent by other methods shall be received by the Administrator on or before the specified date. [40 CFR 63.347(a)(1)(ii)]
  - ii. If acceptable to both the Administrator and the permittee, reports may be submitted on electronic media. [40 CFR 63.347(a)(2)]
- b. The reporting requirements of this § apply to the permittee when such source becomes subject to the provisions of this subpart. [40 CFR 63.347(b)]
- c. Notification of performance test.
  - i. The permittee shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Administrator to have an observer present during the test. Observation of the performance test by the Administrator is optional. [40 CFR 63.347(d)(1)]
  - ii. In the event the permittee is unable to conduct the performance test as scheduled, the provisions of 40 CFR 63.7(b)(2) apply. [40 CFR 63.347(d)(2)]
- d. Notification of compliance status.
  - i. A notification of compliance status is required each time that an affected source becomes subject to the requirements of 40 CFR 63, subpart N. [40 CFR 63.347(e)(1)]
  - ii. The permittee shall send the notification of compliance status to the appropriate authority. The notification shall list for each affected source: [40 CFR 63.347(e)(2)]
    - 1. The applicable emission limitation and the methods that were used to determine compliance with this limitation; [40 CFR 63.347(e)(2)(i)]
    - 2. If a performance test is required by 40 CFR 63, subpart N, the test report documenting the results of the performance test, which contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions of 40 CFR 63.344(e) if these are being followed; [40 CFR 63.347(e)(2)(ii)]

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3. The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of 40 CFR 63.344(e) to comply with the standards. (If the permittee is subject to the construction and reconstruction provisions of 40 CFR 63.345 and had previously submitted emission estimates, the permittee shall state that this report corrects or verifies the previous estimate.) For sources not required to conduct a performance test in accordance with 40 CFR 63.343(b), the surface tension measurement may fulfill this requirement; [40 CFR 63.347(e)(2)(iii)]
  4. For each monitored parameter for which a compliant value is to be established under 40 CFR 63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit; [40 CFR 63.347(e)(2)(iv)]
  5. The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in 40 CFR 63, subpart N; [40 CFR 63.347(e)(2)(v)]
  6. A description of the air pollution control technique for each emission point; [40 CFR 63.347(e)(2)(vi)]
  7. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards in 40 CFR 63.342(f); [40 CFR 63.347(e)(2)(vii)]
  8. A statement by the permittee of the affected source as to whether the source has complied with the provisions of 40 CFR 63, subpart N. [40 CFR 63.347(e)(2)(ix)]
- iii. For sources required to conduct a performance test by 40 CFR 63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 90 calendar days following completion of the compliance demonstration required by 40 CFR 63.7 and 40 CFR 63.343(b). [40 CFR 63.347(e)(3)]
  - iv. For sources that are not required to complete a performance test in accordance with 40 CFR 63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 30 days after the compliance date specified in 40 CFR 63.343(a). [40 CFR 63.347(e)(4)]
- e. Reports of performance test results.
- i. The permittee should report performance test results to the appropriate authority. [40 CFR 63.347(f)(1)]
  - ii. Reports of performance test results shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status required by paragraph H.1.5(d) of this §. [40 CFR 63.347(f)(2)]

### Section III: Applicable Requirements and Compliance Demonstration

- f. Ongoing compliance status reports for major sources.
  - i. The permittee shall submit a summary report to the Administrator to document the ongoing compliance status of the Title V permit. The report shall contain the information identified in paragraph H.1.5(f)(iii) of this permit, and shall be submitted semiannually except when: [40 CFR 63.347(g)(1)]
    - 1. The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or [40 CFR 63.347(g)(1)(i)]
    - 2. The monitoring data collected by the permittee of the affected source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency under § H.1.5(f)(ii) of this permit is approved. [40 CFR 63.347(g)(1)(ii)]
  - ii. Request to reduce frequency of ongoing compliance status reports.
    - 1. An owner or operator who is required to submit ongoing compliance status reports on a quarterly (or more frequent basis) may reduce the frequency of reporting to semiannual if all of the following conditions are met: [40 CFR 63.347(g)(2)(i)]
      - A. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; [40 CFR 63.347(g)(2)(i)(A)]
      - B. The permittee continues to comply with all applicable record keeping and monitoring requirements of subpart A of 40 CFR 63 and of 40 CFR 63 subpart N; and [40 CFR 63.347(g)(2)(i)(B)]
      - C. The Administrator does not object to a reduced reporting frequency for the affected source, as provided in paragraphs R.1.5(f)(ii)(2) and (3) of this Permit. [40 CFR 63.347(g)(2)(i)(C)]
    - 2. The frequency of submitting ongoing compliance status reports may be reduced only after the permittee notifies the Administrator in writing of his or her intention to make such a change, and the Administrator does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Administrator may review information concerning the source's entire previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the permittee's request to reduce reporting frequency, the Administrator will notify the permittee in writing within 45 days after receiving notice of the permittee's intention. The notification from the Administrator to the permittee

### **Section III: Applicable Requirements and Compliance Demonstration**

will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. [40 CFR 63.347(g)(2)(ii)]

3. As soon as the monitoring data required by 40 CFR 63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval from the Administrator to reduce the reporting frequency as allowed by paragraph (f)(ii) of this §. [40 CFR 63.347(g)(2)(iii)]
- iii. Contents of ongoing compliance status reports. The permittee shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the following information: [40 CFR 63.347(g)(3)]
1. The company name and address of the affected source; [40 CFR 63.347(g)(3)(i)]
  2. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); [40 CFR 63.347(g)(3)(ii)]
  3. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by paragraph R.1.5(d) of this §; [40 CFR 63.347(g)(3)(iii)]
  4. The beginning and ending dates of the reporting period; [40 CFR 63.347(g)(3)(iv)]
  5. A description of the type of process performed in the affected source; [40 CFR 63.347(g)(3)(v)]
  6. The total operating time of the affected source during the reporting period; [40 CFR 63.347(g)(3)(vi)]
  7. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; [40 CFR 63.347(g)(3)(viii)]
  8. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source; [40 CFR 63.347(g)(3)(ix)]
  9. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR

### **Section III: Applicable Requirements and Compliance Demonstration**

63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; [40 CFR 63.347(g)(3)(x)]

10. A description of any changes in monitoring, processes, or controls since the last reporting period; [40 CFR 63.347(g)(3)(xi)]
  11. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and [40 CFR 63.347(g)(3)(xii)]
  12. The date of the report. [40 CFR 63.347(g)(3)(xiii)]
- iv. When more than one monitoring device is used to comply with the continuous compliance monitoring required by 40 CFR 63.343(c), the permittee shall report the results as required for each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the permittee shall only report the results from the monitoring device used to meet the monitoring requirements of 40 CFR 63, subpart N. If both devices are used to meet these requirements, then the permittee shall report the results from each monitoring device for the relevant compliance period. [40 CFR 63.347(g)(4)]
- g. The permittee shall submit reports associated with the operation and maintenance plan as identified in 40 CFR 63.347 (g) and (h) and paragraph (f)(3)(iv) of 40 CFR 63.342. [40 CFR 63.342(f)(3)(iv)]

#### **I. STRATOSPHERIC OZONE DEPLETING SUBSTANCES REQUIREMENTS**

The permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82 Subpart F.

#### **J. ASBESTOS REQUIREMENTS**

Should this stationary source, as defined in 40 CFR §61.145, become subject to the national emissions standard for asbestos regulations in 40 CFR Part 61 Subpart M when conducting any renovation or demolition at the premises, then the permittee shall submit proper notification as described in 40 CFR §61.145(b) and shall comply with all other applicable requirements of including but not limited to 40 CFR Part 61 subpart M.

#### **K. INDUSTRIAL BOILERS REQUIREMENTS**

The permittee shall comply with the requirements for industrial boilers pursuant to the Industrial, Commercial and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63 Subpart DDDDD.

#### **L. 112(r) ACCIDENTAL RELEASE REQUIREMENTS**

Should the facility, as defined in 40 CFR §68.3 become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee shall submit a risk management plan (RMP) pursuant to 40 CFR §68.12 by the date specified in §68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR §70.6(c)(5).



### Section III: Applicable Requirements and Compliance Demonstration

#### M. PREMISES-WIDE GENERAL REQUIREMENTS

TABLE III.M: PREMISES-WIDE GENERAL REQUIREMENTS		
Pollutants or Process Parameters	Applicable Regulatory References/Citations	Compliance Demonstration Requirements
Annual Emission Statements	RCSA §22a-174-4	The permittee shall submit annual emission inventory statements requested by the Commissioner as specified in RCSA §22a-174-4(d)(1).
Emission Testing	RCSA §22a-174-5	The permittee shall comply with the methods of sampling, emission testing, sample analysis, and reporting as specified in RCSA §22a-174-5.
Emergency Episode Procedures	RCSA §22a-174-6	The permittee shall comply with the procedures for emergency episodes as specified in RCSA §22a-174-6.
Malfunctions	RCSA §22a-174-7	The permittee shall comply with the procedures for malfunction of control equipment as specified in RCSA §22a-174-7.
Public Availability of Information	RCSA §22a-174-10	The public availability of information shall apply, as specified in RCSA 22a-174-10.
Prohibition against Concealment/ circumvention	RCSA §22a-174-11	The permittee shall comply with the prohibition against concealment or circumvention as specified in RCSA §22a-174-11.
Particulates	RCSA §22a-174-18	The permittee shall comply with the standards for control of particulate emissions as specified in RCSA §22a-174-18.
Sulfur Compounds	RCSA §22a-174-19	The permittee shall comply with the standards for control of sulfur compound emissions as specified in RCSA §22a-174-19.
Organic Compounds	RCSA §22a-174-20	The permittee shall comply with the standards for control of organic compound emissions as specified in RCSA §22a-174-20.
VOC Emissions	Consent Order 8246	The permittee shall comply with the VOC RACT requirements of Consent Order 8246.
Emission Fees	RCSA §22a-174-26	The permittee shall pay an emission fee in accordance with RCSA §22a-174-26(d).

Section IV: Compliance Schedule

NOT APPLICABLE

TABLE IV: COMPLIANCE SCHEDULE				
Emissions units	Applicable regulations	Steps required for achieving compliance (Milestones)	Date by which each step is to be completed	Dates for monitoring, record keeping, and reporting

## **Section V: State Enforceable Special Terms and Conditions**

Only the Commissioner of the Department of Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this §.

- A.** This permit does not relieve the permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Environmental Protection or any federal, local or other state agency. Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the permittee by the Commissioner.
- C.** Odors: The permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises as set forth in RCSA Section 22a-174-23.
- D.** Noise: The permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4, inclusive.
- E.** Hazardous Air Pollutants (HAPs): The permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA Section 22a-174-29.
- F.** Open Burning: The permittee is prohibited from conducting open burning, except as may be allowed by CGS Section 22a-174(f).
- G.** Fuel Sulfur Content: The permittee shall not use #2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS Section 16a-21a.
- H.** Reporting of emissions of greenhouse gases: In accordance with CGS Section 22a-200b(b), not later than April 15, 2006, and annually thereafter, the owner or operator of any facility that is required to report air emissions data to the Department of Environmental Protection pursuant to Title V of the federal Clean Air Act and that has stationary emissions sources that emit greenhouse gases shall report to the regional registry direct stack emissions of greenhouse gases from such sources. The owner or operator shall report all greenhouse gas emissions in a type and format that the regional registry can accommodate.

## Section VI: Permit Shield

### NO PERMIT SHIELD GRANTED

TABLE VI: PERMIT SHIELD				
Regulated Pollutants	Emissions Units	Applicable Requirement or Non-Applicable Requirement Descriptions	Applicable Regulatory References	*Applicability

\*For Applicability, use AR to indicate Applicable Requirement and NR for Non- Applicable Requirement

## **Section VII: Additional Terms and Conditions**

The Administrator of the United States Environmental Protection Agency and the Commissioner of Environmental Protection have the authority to enforce the terms and conditions contained in these §§.

### **A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR**

The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of the Assistant Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the U. S. Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; US EPA, Region 1; One Congress Street; Suite 1100 (SEA); Boston, MA 02114-2023.

### **B. CERTIFICATIONS [RCSA § 22a-174-33(b)]**

In accordance with § 22a-174-33(b) of the RCSA, any report or other document required by this Title V permit and any other information submitted to the Commissioner or Administrator shall be signed by an individual described in § 22a-174-2a(a) of the RCSA, or by a duly authorized representative of such individual. Any individual signing any document pursuant to § 22a-174-33(b) of the RCSA shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in § 22a-174-2a(a)(4) of the RCSA:

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under § 22a-175 of the Connecticut General Statutes, under § 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

### **C. SIGNATORY RESPONSIBILITY [RCSA § 22a-174-2a(a)]**

For purposes of signing any Title V-related application, document, report or certification required by § 22a-174-33 of the Regulations of Connecticut State Agencies, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to § 22a-174-33 of the Regulations of Connecticut State Agencies and either:

## **Section VII: Additional Terms and Conditions**

1. The facilities employ more than two-hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five (25) million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
  - (i) Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
  - (ii) Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
  - (iii) If a duly authorized representative is a named individual in an authorization submitted under subclause (ii) of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause (ii) of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

### **D. ADDITIONAL INFORMATION [RCSA § 22a-174-33(j)(1)(X)]**

The permittee shall submit additional information in writing, at the Commissioner's request, within thirty (30) days of receipt of notice from the Commissioner or by such other date specified by the Commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending the permit or to determine compliance with the permit.

In addition, within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the changed, corrected, or omitted information to the Commissioner.

### **E. MONITORING REPORTS [RCSA § 22a-174-33(o)(1)]**

A permittee, required to perform monitoring pursuant this permit, shall submit to the Commissioner, on forms prescribed by the Commissioner, written monitoring reports on January 30 and July 30 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

### **F. PREMISES RECORDS [RCSA § 22a-174-33(o)(2)]**

## **Section VII: Additional Terms and Conditions**

Unless otherwise required by this permit, the permittee shall make and keep records of all required monitoring data and supporting information for at least five (5) years from the date such data and information were obtained. The permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the Commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

### **G. PROGRESS REPORTS [RCSA § 22a-174-33(q)(1)]**

The permittee shall, on January 30 and July 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner a progress report on forms prescribed by the Commissioner, and certified in accordance with § 22a-174-2a(a)(5) of the RCSA. Such report shall describe the permittee's progress in achieving compliance under the compliance plan schedule contained in this permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in the permit which the permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this permit which the permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the permittee expects to meet them.

Any progress report prepared and submitted pursuant to § 22a-174-33(q)(1) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

### **H. COMPLIANCE CERTIFICATIONS [RCSA § 22a-174-33(q)(2)]**

The permittee shall, on January 30 of each year, or on a more frequent schedule if specified in this permit, submit to

## **Section VII: Additional Terms and Conditions**

the Commissioner, a written compliance certification certified in accordance with § 22a-174-2a(a)(5) of the RCSA and which includes the information identified in Title 40 CFR 70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to § 22a-174-33(q)(2) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

### **I. PERMIT DEVIATION NOTIFICATIONS [RCSA § 22a-174-33(p)]**

Notwithstanding Subsection D of Section VII of this permit, the permittee shall notify the Commissioner in writing, on forms prescribed by the Commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than twenty-four (24) hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten (10) days after such deviation commenced.

### **J. PERMIT RENEWAL [RCSA § 22a-174-33(j)(1)(B)]**

All of the terms and conditions of this permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with §§ 22a-174-33(g), -33(h), and -33(i) of the RCSA.

### **K. OPERATE IN COMPLIANCE [RCSA § 22a-174-33(j)(1)(C)]**

The permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

### **L. COMPLIANCE WITH PERMIT [RCSA § 22a-174-33(j)(1)(G)]**

This permit shall not be deemed to:

1. preclude the creation or use of emission reduction credits or the trading of such credits in accordance with §§ 22a-174-33(j)(1)(I) and 22a-174-33(j)(1)(P) of the RCSA, provided that the Commissioner's prior written approval of the creation, use, or trading is obtained;
2. authorize emissions of an air pollutant so as to exceed levels prohibited under 40 CFR Part 72;
3. authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. impose limits on emissions from items or activities specified in §§ 22a-174-33(g)(3)(A) and (B) of the RCSA unless imposition of such limits is required by an applicable requirement.

### **M. INSPECTION TO DETERMINE COMPLIANCE [RCSA § 22a-174-33(j)(1)(M)]**

The Commissioner may, for the purpose of determining compliance with the permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations



## **Section VII: Additional Terms and Conditions**

regulated or required under the permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

### **N. PERMIT AVAILABILITY**

The permittee shall have available at the facility at all times a copy of this Title V Operating Permit.

### **O. SEVERABILITY CLAUSE** [RCSA § 22a-174-33(j)(1)(R)]

The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the remainder of this permit and the application of such provision to other circumstances shall not be affected.

### **P. NEED TO HALT OR REDUCE ACTIVITY** [RCSA § 22a-174-33(j)(1)(T)]

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **Q. PERMIT REQUIREMENTS** [RCSA § 22a-174-33(j)(1)(V)]

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the permittee's obligation to comply with this permit.

### **R. PROPERTY RIGHTS** [RCSA § 22a-174-33(j)(1)(W)]

This permit does not convey any property rights or any exclusive privileges. This permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including § 4-181a(b) of the Connecticut General Statutes and § 22a-3a-5(b) of the RCSA. This permit shall neither create nor affect any rights of persons who are not parties to this permit.

### **S. ALTERNATIVE OPERATING SCENARIO RECORDS** [RCSA § 22a-174-33(o)(3)]

The permittee shall, contemporaneously with making a change authorized by this permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

### **T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES** [RCSA § 22a-174-33(r)(2)]

The permittee may engage in any action allowed by the Administrator in accordance with 40 CFR 70.4(b)(12)(i) to (iii)(B) inclusive, and 40 CFR 70.4(b)(14)(i) to (iv), inclusive without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor

## **Section VII: Additional Terms and Conditions**

permit modification or revision provided such action does not:

1. constitute a modification under 40 CFR 60, 61 or 63,
2. exceed emissions allowable under the subject permit,
3. constitute an action which would subject the permittee to any standard or other requirement pursuant to 40 CFR 72 to 78, inclusive, or
4. constitute a non-minor permit modification pursuant to § 22a-174-2a(d)(4) of the RCSA.

At least seven (7) days before initiating an action specified in § 22a-174-33(r)(2)(A) of the RCSA, the permittee shall notify the Administrator and the Commissioner in writing of such intended action.

### **U. INFORMATION FOR NOTIFICATION [RCSA § 22a-174-33(r)(2)(A)]**

Written notification required under § 22a-174-33(r)(2)(A) of the RCSA shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The permittee shall thereafter maintain a copy of such notice with the Title V permit. The Commissioner and the permittee shall each attach a copy of such notice to their copy of the permit.

### **V. TRANSFERS [RCSA § 22a-174-2a(g)]**

No person other than the permittee shall act or refrain from acting under the authority of this permit unless this permit has been transferred to another person in accordance with § 22a-174-2a(g) of the RCSA.

The proposed transferor and transferee of a permit shall submit to the Commissioner a request for a permit transfer on a form provided by the Commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The Commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS § 22a-6m.

### **W. REVOCATION [RCSA § 22a-174-2a(h)]**

The Commissioner may revoke this permit on his own initiative or on the request of the permittee or any other person, in accordance with § 4-182(c) of the Connecticut General Statutes, § 22a-3a-5(d) of the RCSA, and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The permittee requesting revocation of this permit shall state the requested date of revocation and provide the Commissioner with satisfactory evidence that the emissions authorized by this permit have been permanently eliminated.

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Pursuant to the Clean Air Act, the Administrator has the power to revoke this permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this permit if the Administrator has determined that the Commissioner failed to act in a timely manner on a permit renewal application.

This permit may be modified, revoked, reopened, reissued, or suspended by the Commissioner, or the Administrator in accordance with § 22a-174-33(r) of the RCSA, Connecticut General Statutes § 22a-174c, or § 22a-3a-5(d) of the RCSA.

### **X. REOPENING FOR CAUSE [RCSA § 22a-174-33(s)]**

This permit may be reopened by the Commissioner, or the Administrator in accordance with § 22a-174-33(s) of the RCSA.

### **Y. CREDIBLE EVIDENCE**

Notwithstanding any other provision of this permit, for the purpose of determining compliance or establishing whether a permittee has violated or is in violation of any permit condition, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information.